

FILED
CLERK, U.S. DISTRICT COURT
4/27/22
CENTRAL DISTRICT OF CALIFORNIA
BY: EQ DEPUTY

AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

Original Duplicate Orig

UNITED STATES DISTRICT COURT

for the

Central District of California

LODGED
CLERK, U.S. DISTRICT COURT
4/27/2022
CENTRAL DISTRICT OF CALIFORNIA
BY: VAM DEPUTY

United States of America,

v.

Natalie Le Demola,
Carleisha Neosha Plummer,
aka "LG," Khanshanda
Eugenea King,
aka "Cassandra King,"
Cleshay Johnson II,
James Antonio Johnson,
aka "Niddy Johnson,"
aka "Big Dawg Niddy,"
aka "Niddy,"
Felicite Aleisha King,
Shafequah Lynete Mitchell,
Loresha Shamone Davis,
Porsha Latrice Johnson,
Donisha Lashawn Pace,
Dominique Charmone Martin,
Mykara Destiny Robertson, and
Amber Jane Wade,

Defendants.

Case No. 2:22-mj-01656 -DUTY

CRIMINAL COMPLAINT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning no later than in or around June 2020 and continuing until at least in or around April 2021, in the county of Los Angeles in the Central District of California, the defendants violated:

Code Section

Offense Description

18 U.S.C. § 1349

Wire fraud conspiracy

This criminal complaint is based on these facts:

Please see attached affidavit.

/s/ Alfredo Rossi

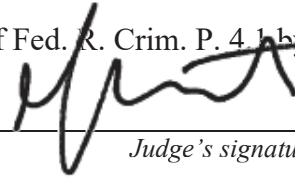
Complainant's signature

Alfredo Rossi, HSI Special Agent

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: April 27, 2022



Judge's signature

City and state: Los Angeles, California

The Hon. Gail J. Standish

Printed name and title

AFFIDAVIT

I, Alfredo Rossi, being duly sworn, declare and state as follows:

PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint against and warrants to arrest the following individuals for a violation of 18 U.S.C. § 1349 (wire conspiracy): **NATALIE LE DEMOLA, CARLEISHA NEOSHA PLUMMER, KHANSHANDA EUGENEA KING ("K. KING"), CLESHAY JOHNSON II ("C. JOHNSON"), JAMES ANTONIO JOHNSON ("J. JOHNSON"), FELICITE ALEISHA KING ("F. KING"), SHAFEQUAH LYNETE MITCHELL ("MITCHELL"), LORESHA SHAMONE DAVIS ("DAVIS"), PORSHA LATRICE JOHNSON ("P. JOHNSON"), DONISHA LASHAWN PACE ("PACE"), DOMINIQUE CHARMONE MARTIN ("MARTIN"), MYKARA DESTINY ROBERTSON ("ROBERTSON"), and AMBER JANE WADE ("WADE").**

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses.

3. This affidavit is intended to show only that there is probable cause for the requested complaint and arrest warrants, and does not purport to set forth all of my knowledge of or investigation into this matter.

4. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only. Further, all dates and

amounts are approximations, and the words "on or about" and "approximately" are omitted for clarity.

5. The beliefs I express in this affidavit are based on my training, experience, knowledge of the investigation, and the reasonable inferences I have drawn from the foregoing sources of information.

BACKGROUND OF AFFIANT

6. I am a Special Agent with Homeland Security Investigations ("HSI") and have been so employed since June 2019. I am currently assigned to the El Camino Real Financial Crimes Task Force, where I investigate fraud, identity theft, money laundering, and other financial crimes. Prior to becoming a Special Agent with HSI, I was employed as a Special Agent with the United States Secret Service ("USSS"), where I was responsible for investigating financial crimes, including theft, fraud, fraudulent identification documents, access device crimes, credit card fraud, check fraud, and money laundering.

7. To become an HSI Special Agent, I completed nine months of training at the Federal Law Enforcement Training Center in Brunswick, Georgia. During my employment with HSI and USSS, I have participated in numerous aspects of criminal investigations, including record analysis, electronic surveillance, physical surveillance, search warrants, arrests, and reviewing evidence from digital devices. I have also spoken to law enforcement agents regarding their experience in criminal investigations, and interviewed defendants, confidential

informants, and witnesses who had personal knowledge of the methods used to commit different criminal offenses.

SUMMARY OF PROBABLE CAUSE

8. The defendants executed a large-scale fraud scheme to use personal identifying information ("PII"), often stolen from identity theft victims, to fraudulently acquire unemployment insurance ("UI") benefits from the California Employment Development Department ("EDD") and several financial institutions. In general, the defendants executed the scheme in the following ways:

9. **DEMOLA**, who is serving a life sentence for first-degree murder in the California Department of Corrections and Rehabilitation ("CDCR"), **PLUMMER** (who at one time was housed with **DEMOLA** in a CDCR prison), **K. KING**, and other coconspirators acquired the PII, such as the names, dates of birth, and social security numbers, of individuals, including identity theft victims, who were not eligible for UI benefits because they were employed, retired, or incarcerated.

10. For example, **DEMOLA** and **PLUMMER** solicited and obtained PII from inmates who were incarcerated at CDCR institutions. **DEMOLA** also obtained PII for CDCR inmates and their visitors from Coconspirator 1, a CDCR employee who accessed CDCR databases for this unauthorized purpose, and disseminated the PII of the identity theft victims to other defendants. At the same time, **K. KING**, in concert with **C. JOHNSON**, acquired the PII of victims who were employed, retired, and in some cases CDCR

inmates, and maintained that victim PII in notebooks ("K. KING's ledger") and other locations.

11. The defendants and their coconspirators then used the victims' PII to submit fraudulent online applications to EDD for UI benefits, including for benefits intended for individuals who were unemployed because of the COVID-19 pandemic (collectively the "fraudulent EDD applications"). On the fraudulent EDD applications, the defendants and their coconspirators assumed the victims' identities and provided materially false information to EDD, including that the victims were unemployed as a direct result of the COVID-19 pandemic. The defendants and their coconspirators also submitted fraudulent EDD applications using their own PII.

12. By submitting the fraudulent EDD applications, the defendants and their coconspirators caused EDD to (a) transmit emails related to the fraudulent EDD applications to the account email addresses, (b) authorize pandemic benefits to be provided to individuals who were ineligible for pandemic benefits because they were employed, retired, or incarcerated, including the victims, the defendants, and the defendants' coconspirators, and (c) EDD debit cards to be mailed to the account mailing addresses, which the defendants (including **MARTIN**) and their coconspirators controlled.

13. After EDD approved the fraudulent EDD applications and disbursed the pandemic benefits funds to the EDD debit accounts, and Bank of America issued the EDD debit cards linked to those accounts, **PLUMMER, K. KING, C. JOHNSON, J. JOHNSON, F. KING,**

MITCHELL, DAVIS, P. JOHNSON, PACE, MARTIN, ROBERTSON, and **WADE** assumed the identities of the EDD account holders and used the corresponding EDD debit cards to make fraudulent cash withdrawals of pandemic benefits from automated teller machines ("ATMs") in Los Angeles, Riverside, and San Bernardino Counties, including at ATMs that Bank of America, Wells Fargo, and JPMorgan Chase ("Chase") operated.

14. Through emails and phone calls, **DEMOLA** instructed other defendants to falsely certify that, among other things, the holders of the fraudulent EDD debit accounts, including the victims, the defendants, and the defendants' coconspirators, continued to be eligible to receive pandemic benefits. **PLUMMER, K. KING, MITCHELL, C. JOHNSON, P. JOHNSON, PACE,** and other coconspirators used cell phones to access the fraudulent EDD debit accounts and falsely certify that the account holders continued to be eligible to receive pandemic benefits.

STATEMENT OF PROBABLE CAUSE

15. Based on my review of law enforcement reports and records, third-party records, government records, information from law enforcement databases, digital evidence, conversations with other law enforcement personnel, and my own knowledge of this case, I know the following:

a. The EDD Unemployment Insurance Program

16. EDD administers UI benefits for residents of California, including Pandemic Unemployment Assistance benefits to individuals who are unemployed because of the COVID-19 pandemic ("pandemic benefits"). To qualify for UI benefits,

including pandemic benefits, a California resident has to submit to EDD an application for the benefits, provide EDD with PII, (including the applicant's name, date of birth, and social security number), and certify to EDD under the penalties of perjury that the COVID-19 pandemic had directly and adversely affected the applicant's employment.

17. Applications for UI benefits, including pandemic benefits, can be submitted to EDD online. An individual who applies online for benefits has to provide EDD with an email address ("account email address") in addition to the applicant's regular mailing address ("account mailing address"). Individuals who are employed, retired, or incarcerated are not eligible for UI benefits, including pandemic benefits.

18. After a person submits an application for UI benefits, including pandemic benefits, EDD transmits an email to the account email address provided on the application confirming the submission of the application and, thereafter, sends correspondences related to the application and the UI benefits to the account email address. Once EDD approves the application and grants UI benefits to the applicant, EDD creates a debit account ("EDD debit account") with Bank of America. A debit card linked to the EDD debit account will then be mailed to the account mailing address.

19. EDD then normally deposits UI benefits, including pandemic benefits, to the EDD debit account. The debit card can be used to withdraw the benefits from the EDD debit account using ATMs, including ATMs that Bank of America, Wells Fargo

Bank, and Chase, operate. Once approved for pandemic benefits, the recipient of the benefits is required to periodically recertify under the penalties of perjury that, among other things, the recipient is unemployed due to the COVID-19 pandemic and therefore remains eligible to receive pandemic benefits.

b. The IPD Accounts

20. On September 6, 2020, **K. KING** and **C. JOHNSON** were arrested in Inglewood, California, with a large cache of evidence related to the fraudulent EDD scheme described in this affidavit (the "IPD arrest").

21. According to the Inglewood Police Department ("IPD") incident report, on September 6, 2020, IPD Officers Ciauri and Salinas were in full uniform in an unmarked Dodge Charger when they saw a black Range Rover driving in the opposite direction with no front license plate, in violation of California Vehicle Code § 5200. The officers made a U-turn and conducted a traffic stop of the Range Rover, and encountered **K. KING** in the driver's seat and **C. JOHNSON** in the passenger seat.

22. When Officer Ciauri told **K. KING** the reason for the stop and asked for identification, **K. KING** produced a California identification card and said that she did not have her license and was on probation. Contemporaneously, **C. JOHNSON** provided Officer Salinas with a photographic copy of his California identification card and said he did not have the actual ID on him. **C. JOHNSON** also told the officer that he was on probation for accessory to murder. The officers then ran **K. KING** and **C. JOHNSON** through an IPD database and found that both were on

post-conviction court supervision, **K. KING** for burglary and **C. JOHNSON** for accessory to murder, with "anywhere, anytime" search conditions. Based on this information, the officers searched the Range Rover and found the following evidence:

a. **K. KING's** wallet between the driver's seat and center console (the "wallet"). Inside the wallet, officers found an EDD card in **K. KING's** name, four EDD cards issued to CMG, SM, RJW, and SRS, two index cards with handwritten victim PII profiles (including names, dates of birth, and social security numbers) for JS and SNW, eight ATM receipts corresponding to the EDD cards, and \$550 in cash.¹ The receipts were for \$1,000 withdrawals at Wells Fargo ATMs. Four of the receipts were for withdrawals made with the CMG and SM cards.

b. A black Android and black Verizon Motorola phone in the center consul, a red iPhone on the passenger seat, and a blue iPhone in the car. As described below, officers also found a gold Samsung phone in **C. JOHNSON's** backpack.

c. A blue Tahari handbag on the passenger floorboard. Inside the bag officers found \$25,180 in one bundle of cash, \$950 in another bundle of cash, eight receipts for \$1,000 ATM withdrawals from several different EDD accounts on

¹ Unless stated otherwise, individuals identified with initials are victims whose PII was used to fraudulently obtain UI benefits from EDD, the term "account" refers to a fraudulent EDD account, "card" refers to an EDD debit card, and "use" of a card refers to a fraudulent ATM withdrawal.

September 4 through 6, 2020, and a parking stub for the Los Angeles International Airport ("LAX") Holiday Inn.²

d. **C. JOHNSON**'s black Dolce and Gabbana backpack (the "D&C backpack"). In the backpack officers found **C. JOHNSON**'s work ID (bearing his name and photograph), a gold Samsung cell phone (which was one of the five phones described above), \$11,961 in cash, an EDD card issued to MP, EDD mail addressed to ARC,³ an ATM receipt, a Polymer80 sticker, and a hotel room card holder bearing the handwritten number 834.

e. A Fendi backpack, believed to be **K. KING**'s, on the driver's side of the rear cargo area of the vehicle. Inside the backpack officers found two notebooks with handwriting that appears to match the handwriting on the index cards found in **K. KING**'s wallet (collectively "**K. KING**'s ledger"), and a receipt for the LAX Holiday Inn. The backpack also contained a sanitary pad, and opened and unopened mail addressed to EDD victims at a particular address on West Florence Avenue in Los Angeles, an apartment complex with outside mailboxes that I believe the defendants used to receive EDD cards and mail.

23. The ledger contained 98 victim PII profiles with notations reflecting payments and account statuses. All 98 profiles from **K. KING**'s ledger were used to apply for EDD benefits, though EDD only issued cards corresponding to 82 of the profiles.

² Unless stated otherwise, all cities described in this affidavit are in California.

³ Travel records show that ARC left the United States approximately eight years ago and has not returned.

24. During the Range Rover search, the officers asked **C. JOHNSON** whether he and **K. KING** were staying at the LAX Holiday Inn, and **C. JOHNSON** responded that they had stayed there but recently moved to a nearby Hilton Hotel ("LAX Hilton"). **K. KING** and **C. JOHNSON** were then arrested on state charges related to the stolen identities and mail. Incident to arrest, on **C. JOHNSON**'s person, officers found \$2,465 in cash and a Holiday Inn Express room key.

25. The officers then requested the help of IPD Officers Lee and Vega, who went to the LAX Hilton and asked the front desk whether **K. KING** or **C. JOHNSON** were guests. The front desk employee said that a particular room was registered in **K. KING**'s name, though the room was vacant. The officers next went to the LAX Holiday Inn, where the front desk employee confirmed that Room 834 was rented to **K. KING** and currently occupied. The officers then conducted a probation compliance check of Room 834 and found a Polymer80 ghost gun with an empty 17-round magazine in the center nightstand between the two beds, a Tommy Hilfiger bag containing an EDD card issued to victim SW and seven receipts reflecting \$1,000 ATM withdrawals, a black leather purse containing EDD mail issued to JS, ODS, and SNW (all of whom were in **K. KING**'s ledger), and four additional receipts reflecting withdrawals from Wells Fargo ATMs.

26. The following chart summarizes the evidence found in **K. KING** and **C. JOHNSON**'s possession during the September 6, 2020 arrest. In the chart, PII stands for "PII profile," "M" denotes EDD mail issued to the victim, "C" denotes a fraudulent EDD card

issued to the victim, and "CR" denotes a fraudulent EDD card and corresponding ATM withdrawal receipt. The EDD accounts corresponding to the evidence seized from **K. KING** and **C. JOHNSON** during the September 6, 2020 arrest are referred to in the remainder of this affidavit as the "IPD accounts."

<i>Victim</i>	<i>Ledger</i>	<i>Fendi Bag</i>	<i>Wallet</i>	<i>D&C Backpack</i>	<i>Room 834</i>
AGW	PII				
ARC				M	
AS	PII				
AJS	PII				
AMS	PII				
BJS	PII	M			
BDW	PII				
CSW	PII				
CF	PII				
CS	PII				
CVS	PII				
CSL	PII				
CMG			CR		
CHW	PII				
DLS	PII	M			
D.Sko.	PII				
DMS	PII				
DSS	PII				
D.Ske.	PII				
D.Fo.	PII				
DW	PII				
DES	PII				
DJW	PII				
D.Sla.	PII				
DJS	PII	M			
FRS	PII				
FGS	PII				
FMS	PII				
F.Sl.	PII				
FCW	PII				
GMS	PII				

GCS	PII				
GBS	PII				
G.Si.	PII				
GWW	PII				
HFS	PII				
HAC	PII				
JW	PII				
JES	PII				
JMS	PII				
JSM	PII				
JL	PII				
J.Si.	PII				
JW	PII				
JSS	PII				
J.Sil.	PII				
JCS	PII				
JJS	PII				
J.Wi.	PII				
JWJ	PII				
JS	PII		PII		M
JHW	PII				
JMD	PII				
JDW	PII				
K.Se.	PII				
LAW	PII				
L.Wi.	PII				
LO	PII				
LJW	PII				
LMS	PII				
LJB	PII				
L.Si.	PII				
MJW	PII	M			
MP				CR	
MRS	PII				
MES	PII				
MAW	PII	M			
MFS	PII				
MS	PII				
MWS	PII				

NTS	PII				
NL	PII				
OWW	PII				
ODS	PII				M
PDW	PII				
PMS	PII				
PHS	PII				
PGW	PII				
RFS	PII				
RS	PII				
RYS	PII				
REW	PII				
RJW	PII	M	C		
RLS	PII	M			
RMW	PII	M			
RLW	PII				
RJS	PII				
SMS	PII				
SM			CR		
SW	PII				
SRS	PII	M	C		
SNW	PII		PII		M
SS	PII				
SLS	PII				
TDS	PII				
TAW	PII				
WJS	PII	M			

27. Notably, at least 10 of the defendants, including **PLUMMER, K. KING, C. JOHNSON, J. JOHNSON, F. KING, MITCHELL, DAVIS, P. JOHNSON, PACE,** and **WADE,** were captured on ATM surveillance video using the fraudulent IPD accounts. For example, as described above, the PII for PGW, FMS, D.Fo., and NTS, were found in **K. KING's** ledger, and EDD cards issued to CMG and MP (along with corresponding ATM receipts) were found in the Range Rover. ATM surveillance photographs depict:

- a. **K. KING** making fraudulent withdrawals using the PGW card.
- b. **PLUMMER** and **MITCHELL** making fraudulent withdrawals using the FMS cards.
- c. **F. KING** making fraudulent withdrawals using the D.Fo. card.
- d. **P. JOHNSON** making fraudulent withdrawals using the SM card.
- e. **WADE** making fraudulent withdrawals using the NTS card.
- f. **C. JOHNSON** and **J. JOHNSON** making fraudulent withdrawals using the CMG card.
- g. **PLUMMER, C. JOHNSON, J. JOHNSON,** and **DAVIS** making fraudulent withdrawals using the MP card.

28. On October 16, 2020, in MJ 20-5008, Magistrate Judge Oliver issued a federal warrant to search the five cell phones from the Range Rover. Agents successfully extracted three of the phones. The Android and Motorola phones from the center console of the Range Rover and **K. KING's** iPhone contained evidence that the phones were used to access dozens of fraudulent EDD accounts, including those associated with the PII found in the ledger, Range Rover, and Room 834.⁴ For example, extracts from the Android and Motorola cell phones show that the phones were

⁴ The iPhone I identify as **K. KING's** was routinely used to access the Gmail account khashandaking@gmail.com.

used to access the WS and AS accounts, both of whom appear in **K. KING**'s ledger, depicted as follows:

18	<p>Creation time 8/27/2020 4:46:04 PM(UTC-7) Username: William [REDACTED]@gmail.com</p> <p>Password: [REDACTED]</p> <p>Service Type: https://portal.edd.ca.gov/</p> <p>Source: Chrome</p>	<p>Creation time Username: anthony [REDACTED]@gmail.com</p> <p>Account Name: Anthony [REDACTED]</p> <p>Password: [REDACTED]</p> <p>0R1uezM_vzMkwwGb9vGXXupo 3brxZHxtZORLyUM2w3hLD_pSs waX3EXQm54fAB58KACKZSXE _N05uPih9FZTUO33J1ydqsU9- GXY8kD_ulHmVvqH6IOjpslbUKu ZSYkEkbRAzykbwOKXZeZ_bDA mVnkl-FrW_hfdT9XxiS_tGmjpw=</p>
----	---	---

d. ATM Photographs

29. Following the September 6, 2020 IPD arrest, I obtained from Bank of America more than 1,000 ATM photographs of the transactions conducted with the IPD accounts and accounts linked via phone analysis (described below). The ATM photographs are digitally stamped with dates, times, and locations.

30. Those Bank of America ATM photographs show **PLUMMER, C. JOHNSON, J. JOHNSON, F. KING, MITCHELL, DAVIS, P. JOHNSON, PACE, ROBERTSON,** and **WADE** making withdrawals using EDD cards in victims' names using the IPD accounts tied to **K. KING** and **C. JOHNSON**.

31. I also acquired photographs from Wells Fargo of the fraudulent ATM withdrawals that were made using the IPD accounts for the time period between August 22, 2020 and October 3, 2020. The photographs show **K. KING, C. JOHNSON, ROBERTSON,** and others making the withdrawals using the fraudulent IPD accounts.

32. I describe the ATM photographs of the defendants making fraudulent withdrawals more fully at the end of this affidavit.

d. Phone Link Analysis

33. During the investigation, I obtained records showing that certain phone numbers were used to call Bank of America to access the fraudulent EDD accounts, that is, change account information, recertify EDD eligibility (which EDD requires every two weeks), and conduct other account functions on the fraudulent EDD accounts. Those records show that phones subscribed to in the names of **PLUMMER, MITCHELL, K. KING, C. JOHNSON, P. JOHNSON,** and **PACE** were used to access dozens of fraudulent EDD accounts. For example:

a. **PLUMMER** was the subscriber of phone number 323-713-5679 ("**PLUMMER's** 5679 number"). This number was used to access at least 15 EDD accounts, including those of **PLUMMER,** and inmates AMP and SMR, who were previously housed with both **DEMOLA** and **PLUMMER** in a CDCR prison.⁵

b. **PLUMMER** and **MITCHELL's** relative was the subscriber of the number 323-270-9079 ("the 9079 number").⁶ That number was used to access at least seven EDD accounts.

c. **MITCHELL** was the subscriber of the phone number 323-456-6874 ("**MITCHELL's** 6874 number"), which was used to

⁵ **DEMOLA** is serving a life-sentence in the CDCR system for first-degree murder. **PLUMMER** was serving a sentence in the CDCR system and was housed with **DEMOLA** until she was paroled on July 8, 2020.

⁶ **PLUMMER** listed this individual as a particular relative on her United States passport application.

access at least 20 EDD accounts, including those of **DEMOLA** and SMR.

d. **K. KING** was the subscriber of phone number 323-532-5345, which was used to access at least 16 EDD accounts, mostly corresponding to the PII found in her ledger.

e. **C. JOHNSON** was the subscriber of phone number 323-641-2036, which was used to access at least seven EDD accounts, mostly corresponding to the PII found in **K. KING's** ledger.

f. **P. JOHNSON** was the subscriber of the phone number 424-310-8249 ("**P. JOHNSON's** 8249 number"), which was used to access at least nine EDD accounts, including those in the names of **AJS, BJS, DLS, JJW, JS, MM, ODS, SNW, and WJS**, all of whom appeared in **K. KING's** ledger. **K. KING** also appears on Wells Fargo surveillance using the **JJW, ODS, and WJS** cards.

g. **PACE** was the subscriber of the phone number 323-809-6628 ("**PACE's** 6628 number"). This number was used to access at least three EDD accounts in the names of **FMS, LS, and MDJ**.

e. CDCR Inmate Interviews

34. In 2021, I and other agents interviewed **DEMOLA, DAVIS**, and several victims whose identities were used in the scheme, all of whom were incarcerated in CDCR prisons, and all of whom were issued fraudulent cards that **PLUMMER, MITCHELL, J. JOHNSON, DAVIS**, and **ROBERTSON** used to withdraw EDD funds. The interviews were audio-recorded, and before each interview, the inmates waived their Miranda rights. I have summarized those interviews as follows.

35. On January 6, 2021, agents interviewed Witness 1,⁷ who denied giving anyone her PII or authorizing anyone to use her identity to apply for EDD benefits. Witness 1 stated that someone asked her to deposit \$50 into **DEMOLA's** prison account because **DEMOLA** owed restitution. Witness 1 otherwise denied knowing **K. KING, C. JOHNSON, or MITCHELL**. On January 20, 2021, agents interviewed Witness 1 again. On this occasion Witness 1 stated that **MITCHELL** gave her the \$50 to deposit into **DEMOLA's** account and that she had been friends with **DEMOLA** for a long time. Witness 1 also stated that she knew **PLUMMER** because they were in the same housing unit at one point and were friends until **PLUMMER** stole personal items from Witness 1's cell. According to Witness 1, everyone in their prison unit knew **PLUMMER** as "LG." Witness 1 told agents that **PLUMMER** was **DEMOLA's** closest friend until **PLUMMER** was paroled, who was released because she was pregnant.

36. On January 6, 2021, agents interviewed Witness 2, who said that she never applied for EDD benefits because her earliest possible release date was in 2029. When asked why she allowed others to apply for benefits using her identity, Witness 2 initially stated that she had not done so, then admitted that in exchange for \$6,000 she provided her PII to a female inmate who had been paroled a few months earlier, who I believe to be

⁷ As stated above, throughout this affidavit, I use initials to refer to victims whose identities were used in the scheme. However, to mitigate witness safety and intimidation concerns, when describing law enforcement interviews, I refer to witnesses by number.

PLUMMER. Witness 2 said she could not remember the inmate's name, but added that this was a "one-time thing" and "it sounded good, and I gave her my information like an idiot." Witness 2 told agents that she never received the promised money. Witness 2 also stated that she gave her PII to a woman named "LG" (**PLUMMER**'s nickname).

37. On January 21, 2021, agents interviewed Witness 2 again. On this occasion Witness 2 said that she had asked other inmates in her unit about LG and that one inmate referred to her as "Carleisha," which is **PLUMMER**'s first name. Witness 2 also said that LG was best friends with **DEMOLA** and that LG always talked about **DEMOLA**. This time Witness 2 admitted that **PLUMMER** asked her if she wanted to make money from the EDD scheme, and told Witness 2 that all she needed was Witness 2's social security number and date of birth, and that **PLUMMER** would "take care of the rest." Witness 2 agreed and told **PLUMMER** "as long as I get my money, I'm not tripping." According to Witness 2, **PLUMMER** was supposed to deposit the money into Witness 2's prison account, but never did, and Witness 2 never heard from **PLUMMER** again.

38. On January 6, 2021, agents interviewed Witness 3, who said that Witness 3 was her cellmate and that a black, pregnant female inmate who she knew as LG approached Witness 3 about participating in the EDD scheme. Witness 3 agreed because she had no money in her prison account and provided her "social security number and information" to **PLUMMER**, who she referred to as LG. **PLUMMER** agreed to give Witness 3 \$11,000 and told Witness

3 that she needed an outside address where EDD would send the card. Witness 3 gave **PLUMMER** her sister's address, and **PLUMMER** said that Witness 3's sister would receive an \$11,000 check in the near future. Sometime later, Witness 3's sister told Witness 3 that an EDD card arrived and asked Witness 3 how she could get unemployment if she was "locked up." Witness 3 told her sister that someone, referring to **PLUMMER**, was "doing something for her," and the sister activated the card, but later told Witness 3 that it was declined at a store. This is when Witness 3 realized that **PLUMMER** tricked her, though she knew all along that her conduct was illegal.

39. On May 24, 2021, agents spoke with **DEMOLA**. During this interview, **DEMOLA** stated that if she and a particular coconspirator got charged, she would take responsibility for the whole scheme. **DEMOLA** also said she knew "it was over" and that she would get charged.

40. On May 18, 2021, agents interviewed **DAVIS**, who was incarcerated at a different CDCR prison for a recent parole violation. One day later, **DAVIS** called **PLUMMER** from jail on a recorded line and said that federal agents had interviewed her. During the call, **PLUMMER** asked **DAVIS** what charges would be filed and who the agents thought was involved in the scheme. **PLUMMER** then told **DAVIS** not to contact her again at **PLUMMER**'s 5679 number⁸ and said that she would "get rid of" that phone. **PLUMMER**

⁸ As described above, **PLUMMER** used this phone to access EDD accounts.

also told **DAVIS** to only communicate with **PLUMMER** through an intermediary.

f. Recorded Inmate Communications

41. During the investigation, I obtained emails from **DEMOLA**'s prison account. Several of the emails are between **DEMOLA** and an email account in the name of JB (the "JB account").⁹ I believe that **PLUMMER** used the JB account. In prison emails I reviewed, the user of the JB account is referred to as "Carleisha" or "LG," being **PLUMMER**'s first name and nickname. Moreover, on July 28, 2020, the day before **PLUMMER** was paroled and released from CDCR custody, **DEMOLA** wrote the following email to the JB account in which she referred to the recipient as a woman, said "tomorrow is your big day" and that she would miss her, and made references to "cards" that **PLUMMER** would handle.¹⁰

hey friend, tomorrow is your big day. I just wanted to say goodbye for now, I love you and so proud of the woman you are. you are a great mom and beautiful friend, I miss you already. I tested negative for the covid. me and like 12-15 others, that's all that was left. God had me because I was around the prison. I want u to get my cards from my man and for u to handle it because I just dont know what is going on with my stuff. we will talk about it. so if u can change it to resend to u that would be great. love u. me and josh talked today, he said we are back together. he is crazy. love u friend, can't wait to talk to u. goodnight and know I am with u.

42. In other emails, **DEMOLA** sent usernames, passwords, card names, victims' names, and account phone numbers to **PLUMMER**

⁹ JB was a male victim of the EDD fraud, and at the time of the email communications between **PLUMMER** and **DEMOLA**, had been an inmate at Salinas Valley State Prison for several years.

¹⁰ Inmates are warned that their emails are monitored when they log onto their prison email accounts.

at the JB email address. For instance, on July 30, 2020, **DEMOLA** sent **PLUMMER** the following email about DF, who I confirmed to be an identity theft victim. **DEMOLA** also mentions MDS, another identity theft victim whose fraudulent EDD account **PLUMMER** accessed, further establishing that **PLUMMER** used the JB email account.

hey friend so glad to talk to u. I gave my best friend your number so she will get in contact with u. I cant wait to bug u tomorrow. so I got some people I need u to contact about my commutation and that can help. I am sending their birthday so u can send them a card and contact them. also please tell the barber to contact me on this jpay and give him my info. Natalie **DEMOLA** x12907. and tell him to put minutes on his phone so I can call and let him know i sent my package list. [Redacted EDD account information, including information related to the DF and MDS accounts]¹¹. check and change to u let me know if u get this.

43. Then, on August 2, 2020, **DEMOLA** sent **J. JOHNSON** the following email where **DEMOLA** expressed disappointment in **J. JOHNSON**, saying that her EDD mail was not going to the right place, which **DEMOLA** identified as Coconspirator 2's address in Hillsboro, North Dakota. In the same email, **DEMOLA** tells **J. JOHNSON** that he should give "the cards" to Carleisha, which again is **PLUMMER**'s first name:

hey there, I don't know what is going on with u but just know u r in my prayers. I have been thinking of u and actually very dissapointed in u. I have not heard from u to know that u r OK or not, u don't pick up my calls, and my mail have not got to where it needs to. I don't get it and thought you were more responsible and communicate. and u know how it is to be locked up and have no one and have to depend on others. u just said I could do that with u and depend on u but with this situation your actions have not shown that. what is going on with u? just be straight

¹¹ Bracketed text denotes redactions and changes made to protect victim PII and EDD account information.

forward with me and don't forget how it felt to be locked up and where I am coming from. I know u may not respond and if so, that is fucked up and u should not treat people like that. but if u do respond just be honest with me like u said u would. and please get my mail to where I told u.

[Coconspirator 2]

[Address in Hillsboro, North Dakota]

please be a man of your word like I believed you were. when u see carliesha, just give her the cards because I think this is too much on u. take care of yourself, I hope to hear back, but by the looks of it, I may not and I still wish u the best.

44. On August 2, 2020, **DEMOLA** sent **PLUMMER** another email at the JB account with more account information and instructions on what to do with the EDD applications and cards. Notably, **DEMOLA's** email makes reference to PO Box 144 in Yucaipa, California ("PO Box 144"), which **MARTIN** used to collect EDD mail (as described below), victim DF, "Niddy" (which is **J. JOHNSON's** nickname), and victim AA (an account **PLUMMER** accessed telephonically accessed):

I don't mean to keep reminding u, but can u please get on it and tell me what is done once u do it.

1) call and say u did not receive it. ask for balance, and shut it off and say u just changed the address and will wait for next week to resend it, but shut it off now for your safety for all of these

[Redacted EDD account information]

this is the one I think niddy messed up:
questions: senior prom theme, candy
favorite high school sport, swim
team u want to lose, Lakers
favorite pet name, lily

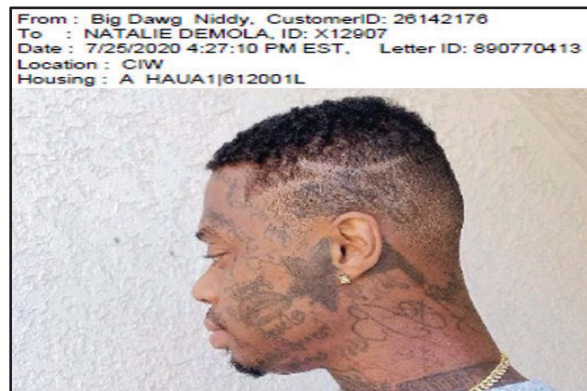
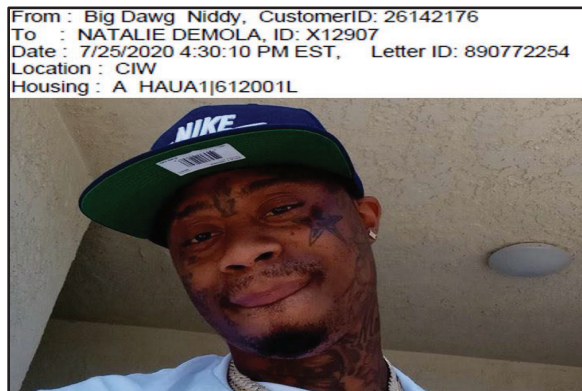
[Redacted EDD account information, including AA account information]

Dominique martin
[Redacted EDD account information]
P.O. box 144
yucaipa ca. 92399

2) call and change pin
[DF] and [MDS], you got the info already

3) cert
[Redacted EDD account information, including DF account information]

45. In this above email, **DEMOLA** says that "Niddy messed up" with an account. The evidence shows that Niddy is **J. JOHNSON**, whose first name is James. **DEMOLA** initially communicates with Niddy while he uses the account under the name Anthony Johnson. Then, **DEMOLA** starts communicating with an account in the name **JAMES JOHNSON**, then Niddy Johnson, and finally Big Dawg Niddy, where **DEMOLA** repeatedly calls the recipient "James" and says that she removed the other accounts from her prison email contact list. Moreover, **J. JOHNSON**, using the Big Dawg Niddy account, sent photographs of himself to **DEMOLA**, depicted below:



46. In addition to **DEMOLA**'s incriminating references to **PLUMMER** about Niddy, **DEMOLA** also communicates with Niddy, or **J.**

JOHNSON, directly about the EDD scheme. For example, on July 22, 2020, **J. JOHNSON**, using the Niddy Johnson account, emailed the following to **DEMOLA** in which he says that he activated a card loaded with \$12,000:

thank u so bby 4 ur email listen bae the card 4 Andrew came 2day bby can I plz activate it an take a rack 2night I really need it bby ill still stack 4nu an won't burn the card lmk if its good yes just one, then stop, reminder its not all mine. wait til we can talk. ok bby i got u thank u im doing it rn whats the birthday cuz I activated but it did not let me set a pin but its 12000 on the card I need the birhtday an the sports team bby asap

47. **DEMOLA** also gave EDD fraud instructions to **PLUMMER** and **J. JOHNSON** over recorded prison phone lines. During the calls, **DEMOLA**, **PLUMMER**, and **J. JOHNSON** at times openly discuss the creation of EDD accounts, recertifying EDD eligibility, and others aspects of the scheme.¹²

48. Moreover, **F. KING** made one recorded call to an incarcerated male relative where she said "I got this new thing where I can make you make some change . . . everybody doing it . . . the EDD thing."

g. Coconspirator 1

49. Between December 2020 and January 2021, CDCR's Investigative Services Unit ("ISU") received information from a complainant that **Coconspirator 1**, an employee at the prison, was providing inmate PII to **DEMOLA** in furtherance of the EDD scheme. According to the complainant, the agreement was that **DEMOLA** would pay **Coconspirator 1** through a cash payment app 50 percent

¹² Each call begins with a warning that the call is monitored.

of **DEMOLA**'s proceeds from the EDD scheme. The complainant stated that she saw **DEMOLA** walk out of **Coconspirator 1**'s office with a spreadsheet of PII, and when she asked **DEMOLA** where she got the spreadsheet, **DEMOLA** responded that she received it from **Coconspirator 1**.

50. In March 2021, I obtained **Coconspirator 1**'s CDCR database access records, which showed that **Coconspirator 1** accessed information, including PII, on hundreds of female inmates, 42 male inmates (despite the fact that **Coconspirator 1** worked in a women's prison), and those inmates' approved visitors.

51. The PII **Coconspirator 1** accessed included names, social security numbers, and dates of birth. In total, during an eight-month period between April and December 2020, **Coconspirator 1** ran 711 inmates and visitor profiles. More than 250 of those names were used to apply for EDD. Records show the following connections, among others, between **Coconspirator 1** and the photographed ATM transactions associated with the scheme.

52. **MITCHELL**'s 6874 phone was used to access several EDD accounts, including the account in **DEMOLA**'s name. At least five cards that **MITCHELL** accessed using her 6874 phone are linked to **Coconspirator 1** and other coconspirators, including the fraudulent cards issued to AAM, DPR, REAT, SMA, and TKJ, as follows.

53. AAM was a female inmate who was not under **Coconspirator 1**'s direct supervision. On June 22, 2020, **Coconspirator 1** checked AAM's PII using the CDCR database. Four

days later, an EDD application was filed in AAM's name. ATM photographs show **MITCHELL**, **ROBERTSON**, and **PLUMMER** using the AAM card as follows:

a. **MITCHELL** used the AAM card on July 20, 2020 to withdraw \$1,000 from an ATM near Los Angeles Street and Alameda Street in Los Angeles.

b. **ROBERTSON** used the AAM card on August 8, 2020 to withdraw \$1,000 at an ATM at Imperial Highway and Paramount Boulevard in Downey.

c. **PLUMMER** used the AAM card on October 10, 2020 to withdraw \$600 at an ATM near 57th Street and Crenshaw Boulevard in Los Angeles.

54. DPR was a female inmate under **Coconspirator 1's** supervision. **Coconspirator 1** accessed her PII on May 4, May 11, and June 16, 2020. Then, on June 27, 2020, an EDD application was filed in DPR's name. As described below, DPR stated in an interview that she never applied for EDD and had not given anyone her PII. ATM photographs show **MITCHELL** and **ROBERTSON** using the DPR card as follows:

a. **MITCHELL** used the DPR card on July 20, 2020 to withdraw \$1,000 from an ATM near Los Angeles Street and Alameda Street in Walnut Park.

b. **ROBERTSON** used the DPR card on August 7, 2020 to withdraw \$1,000 from an ATM near Imperial Highway and Paramount Boulevard in Downey.

55. REAT was a female inmate at the women's prison, though she was not under **Coconspirator 1's** supervision. **Coconspirator 1**

accessed REAT's PII on April 3, 2020. On June 28, 2020, an EDD application was filed in REAT's name. ATM photographs show **MITCHELL** and **ROBERTSON** using the REAT card as follows:

c. **MITCHELL** used the REAT card on July 9, 2020 to withdraw \$1,000 from an ATM in San Diego, on July 14, 2020 to withdraw \$1,000 from an ATM near North Gardena Avenue in Gardena, and on July 20, 2020 to withdraw \$1,000 from an ATM near Los Angeles Street and Alameda in Walnut Park.

d. **ROBERTSON** used the card on August 7, 2020 to withdraw \$1,000 from an ATM near Imperial Highway and Paramount Boulevard in Downey.

56. SMA was a female inmate at the women's prison, though not under **Coconspirator 1's** supervision. **Coconspirator 1** accessed SMA's information on May 6, 2020. On June 16, 2020, an application was filed in SMA's name. The next day **Coconspirator 1** again checked SMA's profile. ATM photographs show **MITCHELL** using the SMA card on July 9, 2020 to withdraw \$1,000 from an ATM in San Diego, on July 14, 2020 to withdraw \$100 from an ATM on Main Street in Gardena, on July 15, 2020 to withdraw \$1,000 from an ATM in Victorville, and on July 20, 2020 to withdraw \$1000 from an ATM on Los Angeles Street and Alameda Street in Walnut Park.

57. Moreover, **PLUMMER's** 5679 phone and a prepaid phone with the number 323-473-6951 (a phone for which **PLUMMER** paid) accessed the EDD accounts of DF and TKJ, among others. **Coconspirator 1** used the CDCR database to access both inmates' PII, and ATM photographs show that **J. JOHNSON** and **DAVIS**

subsequently used the fraudulent EDD cards issued to those inmates.

58. DF, a female inmate at the women's prison, was only briefly under **Coconspirator 1's** supervision from August 14 to 19, 2020. On May 12, 13, 14, and 18, 2020, **Coconspirator 1** accessed DF's PII. On June 30, 2020, an EDD application was filed in DF's name. ATM photographs show that **J. JOHNSON** repeatedly used this card. For example, ATM photographs show that **J. JOHNSON** used the DF card on July 11, 12, 13, 16, and 17, 2020, each time to make a \$1,000 withdrawal from an ATM in Wilmington. Then, on July 18, 2020, **J. JOHNSON** used the DF card to withdraw \$80 from an ATM in Wilmington.

59. TKJ, a female inmate at the women's prison, was never under **Coconspirator 1's** supervision. Nonetheless, **Coconspirator 1** ran TKJ's information on June 11, 2020. Later that day an EDD application was filed in TKJ's name. ATM surveillance recorded **DAVIS** using the TKJ card on August 6, 2020 to withdraw \$500 from an ATM in El Segundo.

h. Dominique Martin

60. During the investigation, I discovered emails between **DEMOLA** and a particular email address that I refer to in this affidavit as the "LVM account." I identified the user of the LVM account as **MARTIN**.

61. On April 11, 2020, **DEMOLA** wrote to the LVM account "hey cousin, just wanted to check in on you and Lisa. hey Lisa! I miss you and please let mike know I have not been able to call

because we are on lockdown. OK, I love u both, email back when u can. good night."

62. Several months later, on July 7, 2020, **DEMOLA** received an email from the LVM account that "Dominique" (**MARTIN**'s first name) signed and that read "Hey I need you to call me ASAP I need all the information about my case you did for me reach out love you Dominique."

63. Moreover, records show that **MARTIN** was married to a woman whose initials are LVM, whose name appears in the LVM account address, and who lived a particular address on Beech Avenue in Yucaipa, California (the "Beech Avenue residence").

64. On August 2, 2020, **DEMOLA** emailed **PLUMMER** at the JB email address. In the email to **PLUMMER**, **DEMOLA** refers to **MARTIN** by full name and PII, and refers to PO Box 144 in Yucaipa, California.

65. On August 3, 2020, **MARTIN**, using the LVM account, sent **DEMOLA** an email reflecting a falling out between the two. In the email, **MARTIN** suggests that she provided PII that was used in the EDD scheme to get EDD benefits, but that the addresses associated with the EDD accounts changed, and that out of frustration, **MARTIN** would go to law enforcement. The email read as follows:

Hey for starters if you think I won't blow this shit all the way out the water I'm gonna say try me I got enough on this shit to nail the coffin If you care about your future for real run me ALL the information you came up on it's real convenient how everyone I sent you got approved but no one got they cards checked myself all address changed for real if you don't find a way to run me my shit I'm spilling it all for real run me at least \$5000 seriously try me dude

cause you handled all that Nd we still got all the correspondents so. Gimme Chris shit at least you foul for this but we all know how to play games we already called looked into it and we got all the resources out here FIX IT FOR REAL make your next move your best move cause I'm about to blow this shit up", " My next move is ISU know that this chess not checkers boo", " If we don't get that by tomorrow it's OVER on GOD", " You played the wrong people Natalie you'll be staying right where your at how's your lawyer going to get you out of this one

66. The next day **DEMOLA** responded, giving **MARTIN** credentials to log into an EDD account and suggesting that the card got sent to a PO Box where no one could sign for the delivery:

[Redacted EDD account information] she gave me this info, go on the site and then call bank. she said when its sent to a po box and they send it priority it needs a signature and gets sent back because po box, no one signs. so it sits at the bank waiting to be called and resent. u will see no foul play, like I said a while ago, I don't want to do this anymore and can't, handle it yourself. and leave me alone.

67. On April 30, 2021, agents conducted an audio-recorded interview of **MARTIN**, who waived her Miranda rights. **MARTIN** admitted that she was married to and separated from LVM, that her address was the Beech Avenue residence, that she had received EDD mail, that she received an EDD card in the KSR's name, and that she used the KSR card to withdrawal between \$10,000 and \$12,000 at a nearby Chase Bank branch.

68. **MARTIN** admitted that she used PO Box 144 to receive EDD mail, which is the same address that **DEMOLA** gave **PLUMMER** in the August 2, 2020 email described above. EDD records show that the card issued to KSR was sent to the Beech Avenue residence and that four fraudulent cards were sent to PO Box 144,

including the MDS card that **DEMOLA** refers to in emails with **PLUMMER** and the fraudulent EDD card issued to **MARTIN**.

69. Further, **MARTIN** admitted to previously living with LVM at a particular address on Third Street in Yucaipa, California, where EDD sent three additional fraudulent cards.

70. **MARTIN** also admitted to agents that she was married to LVM and lived at the Beech Avenue address. EDD records show that at least nine fraudulent EDD cards were sent to the Beech Avenue address.

71. On May 11, 2021, with a task force officer and CDCR officers, a parole search was conducted on **MARTIN**'s home. In the home, agents found EDD correspondence to KSR, a tax document containing victim PII, EDD mail and tax records to MM, and EDD mail to LMVD and MAD.

72. During the encounter, agents interviewed a witness who said that she had recently seen **MARTIN** dispose of additional EDD mail.

i. Victim Interviews

73. During the investigation, I located numerous victims whose identities were used to execute the EDD scheme. I summarize those victim interviews as follows.

74. Witness 4 was an employed policy analyst based in Northern California. Witness 4 told agents that he had been an identity theft victim in the past, and did not authorize anyone to apply for EDD benefits in his name. During the IPD arrest, Witness 4's PII was found in **K. KING**'s ledger.

75. Witness 5, a CDCR inmate, said he did not authorize anyone to apply for EDD benefits while he was incarcerated. When asked if anyone had his information, Witness 5 mentioned an ex-girlfriend in Texas, but otherwise did not know how anyone used his information to apply for EDD benefits. ATM photographs show **F. KING** using the Witness 4 card to make fraudulent withdrawals. Moreover, during the IPD arrest, Witness 4's PII was found in **K. KING's** ledger.

76. Witness 6, a CDCR inmate in the women's prison who had been in custody for the previous seven years, began crying when the interviewing detective told her why he was there. While crying, Witness 6 said that she thought someone stole her identity because she had applied for "stimulus payments" and did not get anything. When the detective asked Witness 6 whether she knew **MITCHELL** or **ROBERTSON**, Witness 6 said no. ATM photographs show **MITCHELL** and **ROBERTSON** using the Witness 6 card to make fraudulent withdrawals, and records show that **MITCHELL's** phone was used to access the Witness 6 account.

77. Witness 7 never applied for EDD employments or give anyone permission to use his information. Witness 7 said that he was ineligible for unemployment because he was retired. Witness 7 did not know **F. KING**, who used the EDD card in his name. During the IPD arrest, Witness 7's PII was found in **K. KING's** ledger.

78. Witness 8, an inmate in the CDCR system, said that he did not apply for EDD benefits or authorize anyone to use his PII. Witness 8 had only authorized his mother and cousin

(neither of whom appear related to this case) to handle his financial affairs. Witness 8 did not know **MITCHELL** and **ROBERTSON**, who used the EDD card in his name. **PLUMMER**'s phone was used to access the Witness 8 account.

79. Witness 9, who is 83 years old, said that he has never lived in, or applied for benefits in, California. Witness 9 has never allowed anyone to use his PII to apply for unemployment benefits. When asked if he knew **K. KING**, who used the card in his name, Witness 9 said "absolute not." **P. JOHNSON**'s phone was used to access the Witness 9 account. Moreover, during the IPD arrest, Witness 9's PII was found in **K. KING**'s ledger, and an ATM receipt corresponding to the Witness 9 card was found in the Range Rover with **K. KING** and **C. JOHNSON**.

80. Witness 10 told agents that he was retired and that he never gave anyone permission to use his PII to apply for EDD benefits. Witness 10 did not know **K. KING**, who used the card in his name. Witness 10's PII was also found in **K. KING**'s ledger, **K. KING**'s phone was used to access the Witness 10 account, and an ATM receipt corresponding to the Witness 10 card was found in the Range Rover with **K. KING** and **C. JOHNSON**.

81. Witness 11, an inmate in the CDCR system, said that he had been incarcerated for 15 years and was not familiar with EDD benefits. Witness 11 said he did not know **MITCHELL** or **PACE**, who used the EDD card in his name. **PACE**'s phone was used to access the MDJ account.

82. Witness 12 was a CDCR inmate until April 2021, when he was release on parole. Witness 12 said he "absolutely did not

file for benefits" in 2020, and never gave anyone permission to use his identity to apply for EDD benefits. Witness 12 had never heard of **J. JOHNSON**, who used the card in his name. **PLUMMER**'s phone was used to access the Witness 12 account, which is also referenced in emails between **DEMOLA** and **PLUMMER**.

83. Witness 13 never applied for EDD employments or give anyone permission to use his information, and was ineligible for unemployment because he was incarcerated. ATM photographs show **PLUMMER**, **C. JOHNSON**, **J. JOHNSON**, and **DAVIS** making fraudulent withdrawals using the Witness 13 card, and **PLUMMER**'s phone was used to access the account. Moreover, both the Witness 13 card and a corresponding receipt were found in **C. JOHNSON**'s Dolce and Cabana backpack during the IPD arrest.

84. Witness 14 was employed as a "handyman." Witness 14 had applied online and by mail for EDD benefits on several occasions, but never received a response. Otherwise, Witness 14 said that he did not authorize anyone to apply for EDD benefits in his name, and did not know **WADE**, who used the EDD card in his name. During the IPD arrest, Witness 14's PII was found in **K. KING**'s ledger.

85. Witness 15 told agents that he used to live in California, but currently lives in Arizona and works as a teacher. Witness 15 has never allowed anyone to use his PII. He did not know **K. KING**, who used the card in his name. During the IPD arrest, Witness 15's PII was found in **K. KING**'s ledger, and an ATM receipt corresponding to the Witness 15 card was found in

the Range Rover with **K. KING** and **C. JOHNSON**. Moreover, **K. KING's** phone was used to access the Witness 15 account.

86. Witness 16 never applied for EDD employments or give anyone permission to use his information. Witness 16 said that he was ineligible for unemployment because he was retired. During the IPD arrest, Witness 16's PII was found in **K. KING's** ledger, EDD mail addressed to Witness 16 was found in the Range Rover with **K. KING** and **C. JOHNSON**, and the Witness 16 card was found in **K. KING's** wallet.

87. Witness 17 never applied for EDD employments or give anyone permission to use his information, and was ineligible for unemployment because she was incarcerated and serving a 25-year sentence for carjacking. ATM photographs show **P. JOHNSON** using the Witness 17 card, which was found in **K. KING's** wallet (along with a corresponding ATM receipt) during the IPD arrest.

88. Witness 18 never applied for EDD employments or give anyone permission to use his information. Witness 18 said that he was ineligible for unemployment because he was employed. During the IPD arrest, Witness 18's PII was found in **K. KING's** ledger, EDD mail to Witness 18 was found in the Range Rover with **K. KING** and **C. JOHNSON**, and the Witness 18 card was found in **K. KING's** wallet.

89. Witness 19, an inmate at the CDCR women's prison, said she did not apply or authorize anyone to apply for EDD benefits using her PII. Witness 19 said she did not know **DAVIS**, who used the EDD card in her name. **PLUMMER's** phone was used to access the Witness 19 account.

j. Employment Records

90. For 22 selected victims, I obtained state employment records to determine whether there was any indication from the victim's wage history that the victim worked in the profession stated on the fraudulent application.¹³ The victims for whom I obtained wage records were KSR, MDS, DF, MDJ, KS, AAM, DMB, MP, TRS, DDJ, SM, NMS, NTS, PGW, DSS, D.Fo., JJW, LS, RJ, AMS, FS, and ARC. I chose to acquire the wage records for these specific victims because ATM photographs collectively show each defendant other than **DEMOLA** and **MARTIN** using the fraudulent EDD cards issued to these victims, **MARTIN** admitted to using the card issued to KSR, and **DEMOLA** references the MDS account in her prison emails. The records further evidenced the fact that the EDD applications were false.

91. For the years 2018 to 2021, of the foregoing victims, only five had wage histories. Those five victims were AMS, DSS, MDS, FS, and MP. The records showed that AMS was employed during that entire period as a legislative analyst. DSS earned retirement benefits from the El Monte School District. MDS worked briefly in 2020, though never as a childcare worker. The only remaining victims were FS and MP, who in 2018 earned \$162 and \$97, respectively, though not for the professions listed on the fraudulent applications filed with their identities.

¹³ For example, the MDS application falsely represented to EDD that MDS was a childcare worker, and the ARC application falsely stated that ARC was a bricklayer.

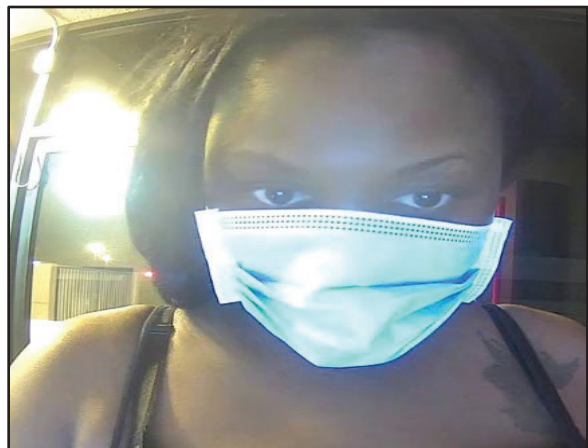
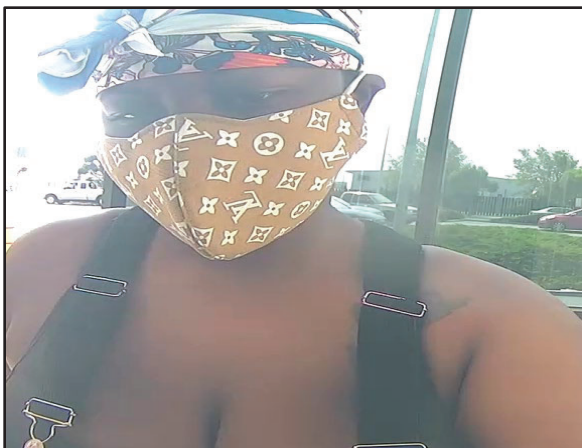
k. ATM Photograph Analysis

92. As described above, I obtained more than 1,000 ATM photographs from Bank of America and Wells Fargo showing **PLUMMER, K. KING, C. JOHNSON, J. JOHNSON, F. KING, MITCHELL, DAVIS, P. JOHNSON, PACE, ROBERTSON,** and **WADE** conducting fraudulent transactions with fraudulent EDD debit cards.

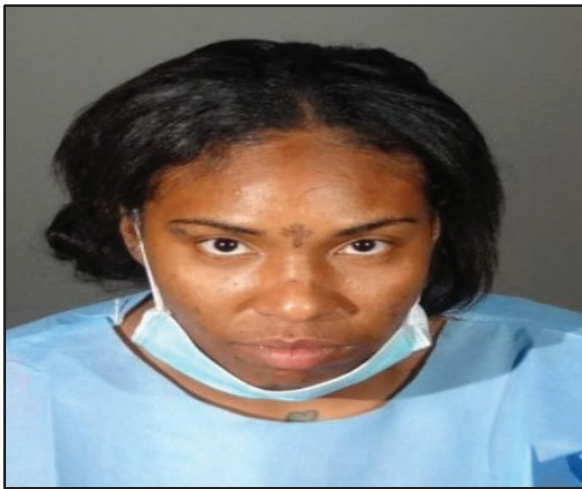
93. To determine the specific defendants depicted in the ATM photographs, I used known photographs of the defendants (including Department of Motor Vehicle ("DMV") and booking photographs) and the defendants' unique physical characteristics.

94. With respect to the ATM photographs, I summarize certain findings as follows.

95. **PLUMMER** was recorded on ATM surveillance footage conducting dozens of fraudulent EDD transactions using cards issued to victims, **DEMOLA,** and herself. In terms of unique characteristics, **PLUMMER** has a bird tattoo on her chest. For two examples, the following photographs show **PLUMMER** on August 24, 2020 using the NMS card (left) and on October 13, 2020 (right) using the TRS card to make fraudulent EDD withdrawals.



96. Wells Fargo ATM surveillance cameras recorded **K. KING** using cards issued to several victims, including PGW, JJW, and L.Si. **K. KING** has a cross tattoo on her forehead between her eyes, making her easily identifiable. For example, a booking photograph of **K. KING** (left) and an ATM photograph of **K. KING** using the PGW card on September 5, 2020 (right) appear as follows:

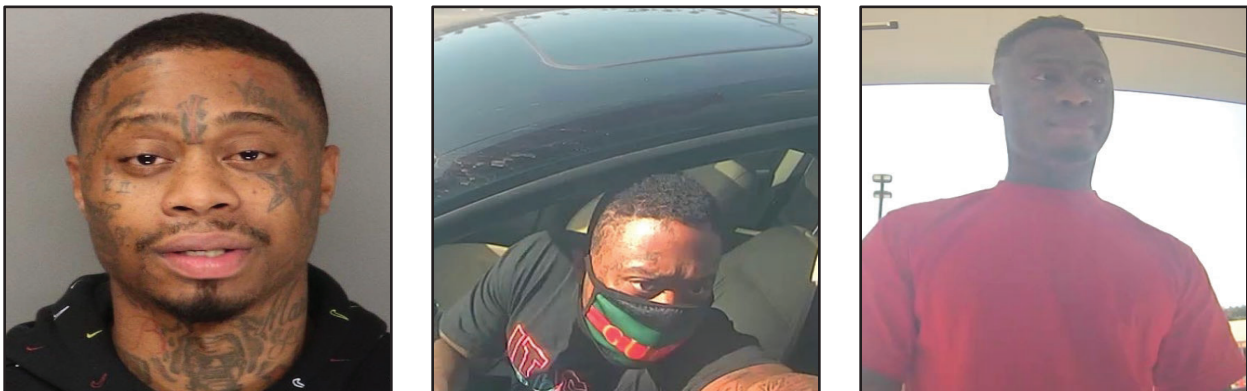


97. **C. JOHNSON** was recorded on ATM surveillance footage conducting fraudulent transactions using a number of EDD cards, including those issued to MP and ARC. **C. JOHNSON** has an "all-star" tattoo on his right shoulder, along with several identifiable tattoos on his neck, arms and chest. The following images are a DMV photograph of **C. JOHNSON** (left), and ATM photographs that depict **C. JOHNSON** using the MP card on

September 1, 2020 (center) and the ARC card on September 27, 2020 (right).



98. **J. JOHNSON** was recorded on ATM surveillance footage conducting fraudulent transactions using a number of EDD cards, including those issued to DF and MDS. **J. JOHNSON** has unique tattoos on his face above both eyes, a symbol tattoo between his eyebrows, and tattoos on his neck and chest. The following images are a known booking photograph of **J. JOHNSON** (left), and ATM photographs that depict **J. JOHNSON** using the MDS card on July 9, 2020 (center) and the DRF card on July 25, 2020 (right).



99. **F. KING** was recorded on ATM surveillance conducting fraudulent transactions using EDD cards issued to numerous victims (including DSS, RJ, D.Fo., and TAW), along with the card

issued to **K. KING**. Moreover, **F. KING** has a unique tattoo above her right eye, a red heart tattoo on her chest, lettered tattoos (including the word "love") on her chest, and lettered tattoos on her arms. The following images are a DMV photograph of **F. KING** (left), and ATM photographs that depict **F. KING** using the DSS card on September 9, 2020 (center) and the RJ card on September 23, 2020 (right).

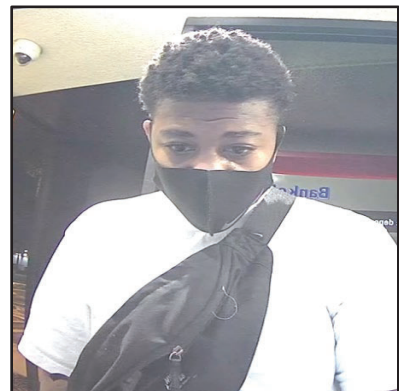
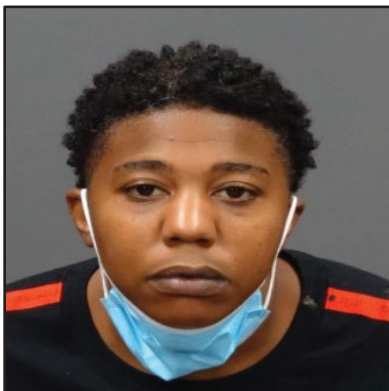


100. **MITCHELL** was recorded on ATM surveillance footage conducting dozens of fraudulent EDD transactions using cards issued to victims, along with a card issued to **PLUMMER**. **MITCHELL** has star tattoos on her right chest, lettered tattoos on both forearms, and a tattoo on her left shoulder. The following images are a DMV photograph of **MITCHELL** (left), and ATM

photographs that depict **MITCHELL** using the MDJ card on June 27, 2020 (center) and the SMR card on July 8, 2020 (right).



101. **DAVIS** was recorded on ATM surveillance footage conducting fraudulent transactions with the cards issued to numerous victims, including DMB, MP, AMP, TRS, ITC, and TKJ. **DAVIS** has a crown tattoo on his right arm and unique tattoos on his chest. The following images are a known booking photograph of **DAVIS** (left), and ATM photographs that depict **DAVIS** using the TRS card on August 2, 2020 (center) and the DMB card on August 6, 2020 (right).



102. **P. JOHNSON**, among other things, was recorded on ATM surveillance footage using the SM card several times in August 2020. **P. JOHNSON** has a piercing below her bottom lip and above her left eye, along with unique tattoos on her chest and right arm. The following images are a booking photograph of **P. JOHNSON** (left), and ATM photographs that show **P. JOHNSON** using the SM card on August 13, 2020 (center and right).



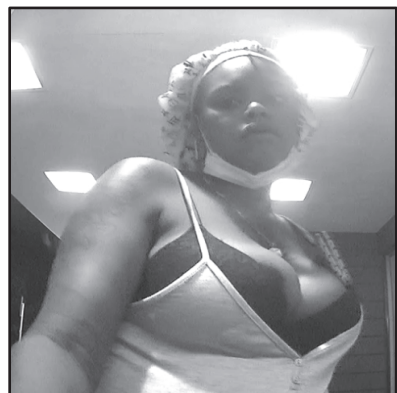
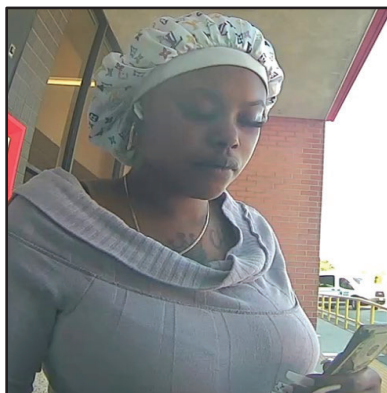
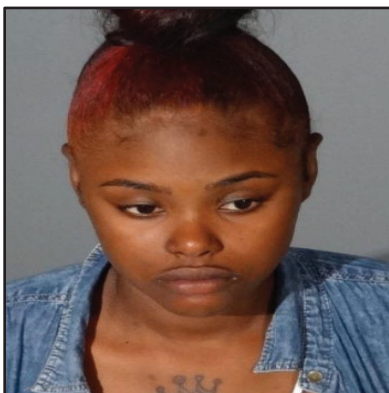
103. Moreover, **P. JOHNSON** drove a vehicle bearing license plate 8DLN623 when conducting fraudulent EDD activity. Records show that this vehicle was registered to **P. JOHNSON**.

104. **PACE**, among other things, was recorded on ATM surveillance footage using the MDJ card on several occasions between August and October 2020. **PACE** has lettered tattoos on her right arm. The following images are a DMV photograph of **PACE** (left), and ATM photographs that depict **PACE** using the MDJ card

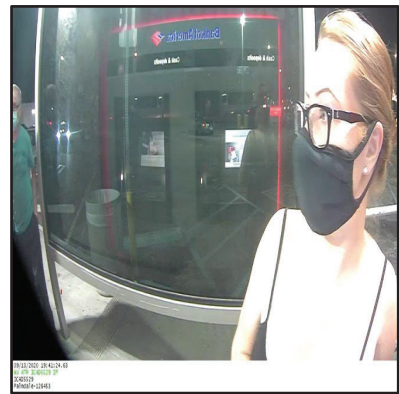
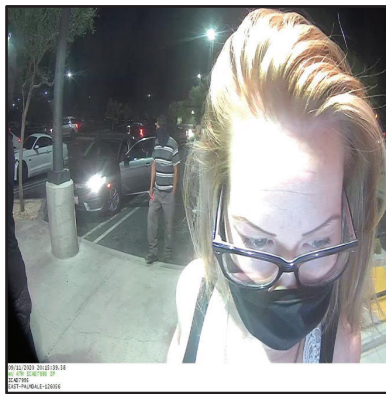
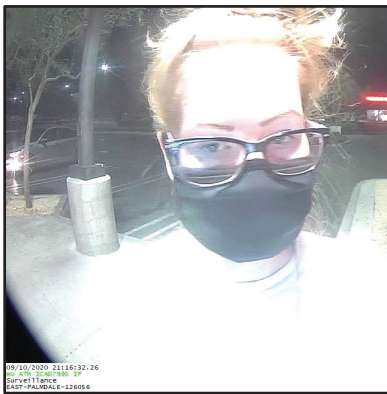
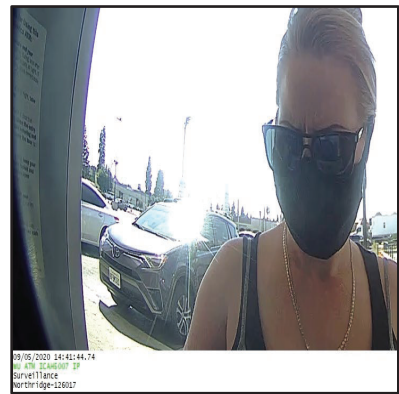
on August 23, 2020 (center) and the MDJ card on October 12, 2020 (right).

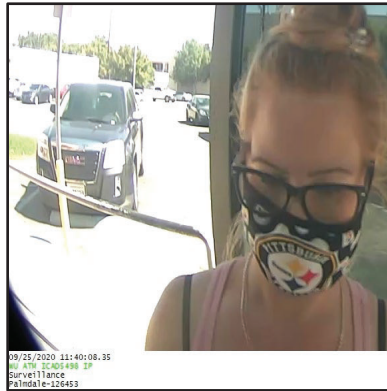
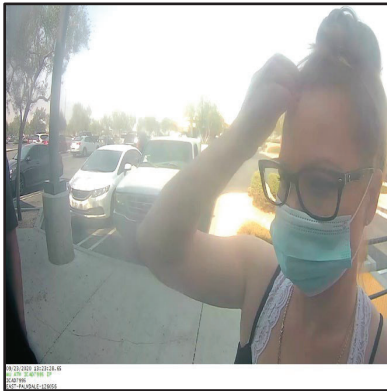
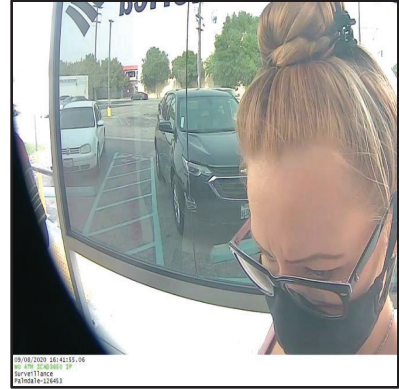
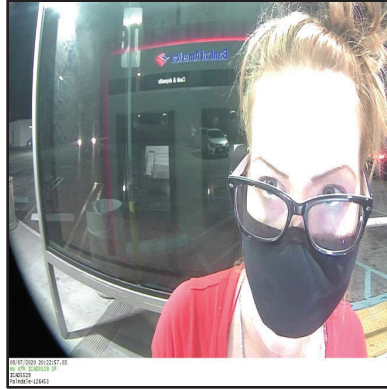
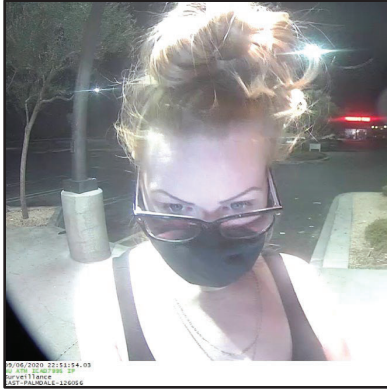


105. **ROBERTSON** was recorded on ATM surveillance footage conducting fraudulent transactions with cards issued to several victims (including JB, DDJ, KS, MLL, REAT, DPR, and AAM), along with the card issued to **DEMOLA**. Notably, on August 7, 2020, **ROBERTSON** was recorded on ATM surveillance fraudulently using *nine* separate EDD cards on in a single day. **ROBERTSON** has a unique crown tattoo on the middle of her chest. The following images are a known booking photograph of **ROBERTSON** (left), and ATM photographs that depict **ROBERTSON** using the REAT card on August 7, 2020 (center) and the DPB card on August 13, 2020.



106. **WADE** was recorded on ATM surveillance conducting numerous fraudulent EDD transactions. **WADE** has unique tattoos on her back. The following are **WADE**'s DMV photograph and ATM photographs of **WADE** using the NTS card to fraudulent withdraw EDD funds from the NTS cards in 11 separate transactions between August 31, 2020 and September 26, 2020. With one exception, **WADE** withdrew \$1,000 in all of the foregoing transactions. As described above, NTS told investigators that he did not know **WADE**.





107. In total, the defendants and their coconspirators opened hundreds of fraudulent EDD accounts and cost the EDD program millions of dollars.

GROUNDS FOR SEALING

108. Reasonable cause exists to seal the applications, warrants, and warrant returns associated with this affidavit, as well as to seal this affidavit itself. This investigation is ongoing, and to this point, has remained covert. There is reason to believe that failing to seal will result in (1) endangering the life or physical safety of an individual, (2) flight from prosecution, (3) destruction or alteration of evidence, (4) intimidation of potential witnesses, (5) otherwise seriously jeopardizing the investigation, or (6) unduly delaying

CONCLUSION

109. For the foregoing reasons, there is probable cause to issue the requested complaints and arrest warrants.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 27th day of April, 2022.



THE HONORABLE Gail J. Standish
UNITED STATES MAGISTRATE JUDGE