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UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

March 2022 Grand Jury

UNITED STATES OF AMERICA,

 Plaintiff,

 v.

 NATALIE LE DEMOLA,
 CARLEISHA NEOSHA PLUMMER,
 aka "LG,"
 KHANSHANDA EUGENA 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.

CR 2:22-cr-00205-JFW

I N D I C T M E N T

[18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud and Bank Fraud; 18 U.S.C. § 1344(2): Bank Fraud; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 982: Criminal Forfeiture]

1 The Grand Jury charges:

2 COUNT ONE

3 [18 U.S.C. § 1349]

4 [ALL DEFENDANTS]

5 A. INTRODUCTORY ALLEGATIONS

6 At times relevant to this Indictment:

7 1. The California Employment Development Department ("EDD")
8 administered unemployment insurance ("UI") benefits for residents of
9 California, including Pandemic Unemployment Assistance benefits to
10 individuals who were unemployed because of the COVID-19 pandemic
11 ("pandemic benefits").

12 2. To qualify for UI benefits, including pandemic benefits, a
13 California resident had to submit to EDD an application for the
14 benefits; provide EDD with personal identifying information ("PII"),
15 including the applicant's name, date of birth, and social security
16 number; and certify to EDD under the penalties of perjury that the
17 COVID-19 pandemic had directly and adversely affected the applicant's
18 employment.

19 3. Applications for UI benefits, including pandemic benefits,
20 could be submitted to EDD online. An individual who applied online
21 for benefits would provide EDD with an email address ("account email
22 address") in addition to the applicant's physical mailing address
23 ("account mailing address").

24 4. Individuals who were employed, retired, or incarcerated
25 were not eligible for UI benefits, including pandemic benefits.

26 5. After a person submitted an application for UI benefits,
27 including pandemic benefits, EDD would transmit an email to the
28 account email address confirming the submission of the application

1 and, thereafter, would send correspondences related to the
2 application and the UI benefits, including pandemic benefits, to the
3 account email address.

4 6. Once EDD approved the application and granted pandemic
5 benefits to the applicant, EDD would create a debit account ("EDD
6 debit account") with Bank of America, NA ("Bank of America"). A debit
7 card linked to the EDD debit account would then be mailed to the
8 account mailing address.

9 7. EDD would deposit UI benefits, including pandemic benefits,
10 to the EDD debit account. The debit card could then be used to
11 withdraw the benefits from the EDD debit account using automated
12 teller machines ("ATMs"), including ATMs that Bank of America, Wells
13 Fargo Bank, NA ("Wells Fargo"), and JPMorgan Chase Bank, NA
14 ("Chase"), operated.

15 8. Once approved for pandemic benefits, the recipient of the
16 benefits would be required to periodically recertify under the
17 penalties of perjury that, among other things, the recipient was
18 unemployed due to the COVID-19 pandemic and therefore remained
19 eligible to receive pandemic benefits.

20 9. Bank of America, Wells Fargo, and Chase were financial
21 institutions that were insured by the Federal Deposit Insurance
22 Company.

23 B. THE OBJECTS OF THE CONSPIRACY

24 10. Beginning no later than in or around June 2020 and
25 continuing until at least in or around April 2021, in Los Angeles,
26 Riverside, Ventura, and San Bernardino Counties, within the Central
27 District of California, and elsewhere, defendants NATALIE LE DEMOLA
28 ("DEMOLA"), CARLEISHA NEOSHA PLUMMER, also known as ("aka") "LG"

1 ("PLUMMER"), KHANSHANDA EUGENA KING, aka "Cassandra King"
2 ("K. KING"), CLESHAY JOHNSON II ("C. JOHNSON"), JAMES ANTONIO
3 JOHNSON, aka "Niddy Johnson," aka "Big Dawg Niddy," aka "Niddy"
4 ("J. JOHNSON"), FELICITE ALEISHA KING ("F. KING"), SHAFEQUAH LYNETE
5 MITCHELL ("MITCHELL"), LORESHA SHAMONE DAVIS ("DAVIS"), PORSHA
6 LATRICE JOHNSON ("P. JOHNSON"), DONISHA LASHAWN PACE ("PACE"),
7 DOMINIQUE CHARMONE MARTIN ("MARTIN"), MYKARA DESTINY ROBERTSON
8 ("ROBERTSON"), and AMBER JANE WADE ("WADE"), conspired with one
9 another, and with others known and unknown to the Grand Jury, to
10 commit: (a) wire fraud, in violation of Title 18, United States Code,
11 Section 1343; and (b) bank fraud, in violation of Title 18, United
12 States Code, Section 1344(2).

13 C. MANNER AND MEANS OF THE CONSPIRACY

14 11. The objects of the conspiracy were carried out, and were to
15 be carried out, in substance, as follows:

16 a. Defendants DEMOLA, PLUMMER, and K. KING, and other
17 coconspirators, would acquire the PII, such as the names, dates of
18 birth, and social security numbers, of individuals, including
19 identity theft victims, who were not eligible for UI benefits,
20 including pandemic benefits, because they were employed, retired, or
21 incarcerated. For example:

22 i. Defendants DEMOLA and PLUMMER would solicit and
23 obtain PII from inmates who were incarcerated at institutions within
24 the California Department of Corrections and Rehabilitation ("CDCR").

25 ii. Defendant DEMOLA would obtain PII for CDCR
26 inmates and their visitors from an associate who would access CDCR
27 databases for this unauthorized purpose, and then disseminate the PII
28 of the identity theft victims to other defendants and coconspirators.

1 iii. Defendant K. KING, in concert with defendant
2 C. JOHNSON, would acquire the PII of victims who were employed,
3 retired, and in some cases CDCR inmates, and maintain that victim PII
4 in notebooks ("defendant K. KING's notebooks") and other locations.

5 b. Coconspirators would use the victims' PII to submit
6 fraudulent online applications to EDD, for UI benefits, including
7 pandemic benefits (the "fraudulent EDD applications").

8 c. Coconspirators would assume the victims' identities
9 and provide materially false information to EDD on the fraudulent EDD
10 applications, including that the victims were unemployed as a direct
11 result of the COVID-19 pandemic. For example, defendants and their
12 coconspirators would submit fraudulent EDD applications on which they
13 provided materially false information using the identities of victims
14 K.S.R., M.D.S., D.F., M.D.J., K.S., A.A.M., D.M.B., M.P., T.R.S.,
15 D.D.J., S.M., N.M.S., N.T.S., P.G.W., D.S.S., D.Fo., J.J.W., L.Si.,
16 R.J., A.M.S., F.S., and A.R.C., among other victims.

17 d. Coconspirators would also submit fraudulent EDD
18 applications using PII belonging to coconspirators, including the PII
19 belonging to defendants DEMOLA, PLUMMER, and K. KING, and on those
20 applications, provide information they knew to be false that was also
21 material, including that they were unemployed as a direct result of
22 the COVID-19 pandemic.

23 e. By submitting the fraudulent EDD applications,
24 coconspirators would cause EDD to:

25 i. Transmit emails that were related to the
26 fraudulent EDD applications to the account email addresses;

27 ii. Authorize pandemic benefits to be provided to
28 individuals who were ineligible for pandemic benefits because they

1 were employed, retired, or incarcerated, including the identity theft
2 victims, defendants, and defendants' coconspirators; and

3 iii. Cause EDD debit cards, that is, debit cards
4 linked to the EDD debit accounts at Bank of America, to be mailed to
5 the account mailing addresses, which defendants, including defendant
6 MARTIN, and defendants' coconspirators controlled.

7 f. After EDD approved the fraudulent EDD applications and
8 disbursed the pandemic benefits funds to the EDD debit accounts, and
9 Bank of America issued the EDD debit cards linked to those accounts,
10 defendants PLUMMER, K. KING, C. JOHNSON, J. JOHNSON, F. KING,
11 MITCHELL, DAVIS, P. JOHNSON, PACE, MARTIN, ROBERTSON, and WADE, and
12 their coconspirators, would fraudulently assume the identities of the
13 EDD debit account holders and use the corresponding EDD debit cards
14 to make fraudulent cash withdrawals of pandemic benefits, knowing
15 that they were not entitled to the withdrawals, from ATMs in Los
16 Angeles, Riverside, and San Bernardino Counties, including at ATMs
17 that Bank of America, Wells Fargo, and Chase operated.

18 g. From Corona, California, through emails that generated
19 interstate wire signals and through phone calls, defendant DEMOLA
20 would instruct defendants, including defendants PLUMMER and
21 J. JOHNSON, to falsely certify that, among other things, the holders
22 of the fraudulent EDD debit accounts, including the victims,
23 defendants, and defendants' coconspirators, continued to be eligible
24 to receive pandemic benefits.

25 h. Defendants PLUMMER, K. KING, MITCHELL, C. JOHNSON,
26 P. JOHNSON, and PACE, and other coconspirators, would use cell phones
27 to access the fraudulent EDD debit accounts and falsely certify that
28 the account holders, including the victims, defendants, and

1 defendants' coconspirators, continued to be eligible to receive
2 pandemic benefits.

3 D. OVERT ACTS

4 12. In furtherance of the conspiracy, and to accomplish its
5 objects, defendants DEMOLA, PLUMMER, K. KING, C. JOHNSON, J. JOHNSON,
6 F. KING, MITCHELL, DAVIS, P. JOHNSON, PACE, MARTIN, ROBERTSON, and
7 WADE, and others known and unknown to the Grand Jury, committed and
8 willfully caused others to commit, on or about the dates set forth
9 below, the following overt acts, among others, within the Central
10 District of California, and elsewhere:

11 Overt Act No. 1: On April 3, 2020, Coconspirator 1 accessed
12 the PII of victim R.E.A.T., an inmate within the CDCR prison system,
13 using a CDCR database.

14 Overt Act No. 2: On May 6, 2020, Coconspirator 1 accessed the
15 PII of victim S.M.A., an inmate within the CDCR prison system, using
16 a CDCR database.

17 Overt Act No. 3: On May 12, 2020, Coconspirator 1 accessed
18 the PII of victim D.F., an inmate within the CDCR prison system,
19 using a CDCR database.

20 Overt Act No. 4: On May 13, 2020, Coconspirator 1 accessed
21 the PII of victim D.F., an inmate within the CDCR prison system,
22 using a CDCR database.

23 Overt Act No. 5: On May 14, 2020, Coconspirator 1 accessed
24 the PII of victim D.F., an inmate within the CDCR prison system,
25 using a CDCR database.

26 Overt Act No. 6: On May 18, 2020, Coconspirator 1 accessed
27 the PII of victim D.F., an inmate within the CDCR prison system,
28 using a CDCR database.

1 Overt Act No. 7: On an unknown date, defendant DEMOLA
2 received from a coconspirator PII of inmates within the CDCR prison
3 system.

4 Overt Act No. 8: On June 6, 2020, coconspirators
5 electronically filed an application for pandemic assistance benefits
6 in the name of defendant PLUMMER, which was approved.

7 Overt Act No. 9: On June 6, 2020, coconspirators
8 electronically filed an application for pandemic assistance benefits
9 in the name of defendant DEMOLA, which was approved.

10 Overt Act No. 10: On June 10, 2020, coconspirators
11 electronically filed an application for pandemic assistance benefits
12 in the name of victim M.D.J., an inmate within the CDCR prison
13 system, which was approved.

14 Overt Act No. 11: On June 10, 2020, coconspirators
15 electronically filed an application for pandemic assistance benefits
16 in the name of victim L.S., an inmate within the CDCR prison system,
17 which was approved.

18 Overt Act No. 12: On June 11, 2020, Coconspirator 1 accessed
19 the PII of victim T.K.J., an inmate within the CDCR prison system,
20 from an internal CDCR database.

21 Overt Act No. 13: On June 11, 2020, coconspirators
22 electronically filed an application for pandemic assistance benefits
23 in the name of victim T.K.J., an inmate within the CDCR prison
24 system, which was approved.

25 Overt Act No. 14: On June 11, 2020, coconspirators
26 electronically filed an application for pandemic assistance benefits
27 in the name of victim M.L.L., an inmate within the CDCR prison
28 system, which was approved.

1 Overt Act No. 15: On June 12, 2020, coconspirators
2 electronically filed an application for pandemic assistance in the
3 name of victim J.B., an inmate within the CDCR prison system, which
4 was approved.

5 Overt Act No. 16: On or before June 16, 2020, defendant
6 PLUMMER approached A.M.P. and asked her for her PII, which A.M.P.
7 provided.

8 Overt Act No. 17: On or before June 16, 2020, defendant
9 PLUMMER approached S.M.R. and asked her for her PII, which S.M.R.
10 provided.

11 Overt Act No. 18: On June 16, 2020, coconspirators
12 electronically filed an application for pandemic assistance in the
13 name of A.M.P., an inmate within the CDCR prison system, which was
14 approved.

15 Overt Act No. 19: On June 16, 2020, coconspirators
16 electronically filed an application for pandemic assistance in the
17 name of victim S.M.R., an inmate within the CDCR prison system, which
18 was approved.

19 Overt Act No. 20: On June 16, 2020, coconspirators
20 electronically filed an application for pandemic assistance in the
21 name of victim S.M.A., an inmate within the CDCR prison system, which
22 was approved.

23 Overt Act No. 21: On June 16, 2020, Coconspirator 1 accessed
24 the PII of victim D.P.R., an inmate within the CDCR prison system,
25 using a CDCR database.

26 Overt Act No. 22: On June 19, 2020, coconspirators
27 electronically filed an application for pandemic assistance benefits
28 in the name of defendant K. KING, which was approved.

1 Overt Act No. 23: On June 22, 2020, Coconspirator 1 accessed
2 the PII of victim A.A.M., an inmate within the CDCR prison system,
3 using a CDCR database.

4 Overt Act No. 24: On June 23, 2020, coconspirators
5 electronically filed an application for pandemic assistance benefits
6 in the name of victim M.D.S., an inmate within the CDCR prison
7 system, which was approved.

8 Overt Act No. 25: On June 24, 2020, coconspirators
9 electronically filed an application for pandemic assistance benefits
10 in the name of victim M.C.B., an inmate within the CDCR prison
11 system, which was approved.

12 Overt Act No. 26: On June 24, 2020, coconspirators
13 electronically filed an application for pandemic assistance benefits
14 in the name of victim D.D.J., which was approved.

15 Overt Act No. 27: On June 24, 2020, defendant MARTIN, using an
16 EDD debit card ending in 9975, issued in the name of victim K.S.R.,
17 withdrew \$503 from a Chase ATM in Yucaipa, California.

18 Overt Act No. 28: On June 27, 2020, defendant MITCHELL, using
19 an EDD debit card ending in 0868, issued in the name of victim
20 M.D.J., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
21 California.

22 Overt Act No. 29: On June 27, 2020, coconspirators
23 electronically applied for pandemic assistance benefits in the name
24 of victim D.P.R., which was approved.

25 Overt Act No. 30: On June 28, 2020, coconspirators
26 electronically applied for pandemic assistance benefits in the name
27 of victim A.A.M., which was approved.

28

1 Overt Act No. 31: On June 28, 2020, coconspirators
2 electronically applied for pandemic assistance benefits in the name
3 of victim K.S., which was approved.

4 Overt Act No. 32: On June 28, 2020, coconspirators
5 electronically applied for pandemic assistance benefits in the name
6 of victim R.E.A.T., which was approved.

7 Overt Act No. 33: On June 30, 2020, coconspirators
8 electronically applied for pandemic assistance benefits in the name
9 of victim D.F., an inmate within the CDCR prison system, which was
10 approved.

11 Overt Act No. 34: On July 6, 2020, coconspirators
12 electronically applied for pandemic assistance benefits in the name
13 of victim D.P.B., which was approved.

14 Overt Act No. 35: On July 9, 2020, defendant MITCHELL, using
15 an EDD debit card ending in 0868, issued in the name of victim M.D.J.
16 withdrew \$1,000 from a Bank of America ATM in Lakewood, California.

17 Overt Act No. 36: On July 9, 2020, defendant MITCHELL, using
18 an EDD debit card ending in 0736, issued in the name of victim L.S.,
19 withdrew \$1,000 from a Bank of America ATM in Lakewood, California.

20 Overt Act No. 37: On July 9, 2020, defendant MITCHELL, using
21 an EDD debit card ending in 1414, issued in the name of defendant
22 PLUMMER, withdrew \$1,000 from a Bank of America ATM in Lakewood,
23 California.

24 Overt Act No. 38: On July 10, 2020, defendant J. JOHNSON,
25 using an EDD debit card ending in 1940, issued in the name of victim
26 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
27 California.

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1 Overt Act No. 39: On July 11, 2020, defendant F. KING called
2 an inmate within the CDCR prison system and asked that inmate if he
3 wanted to be a part of the EDD fraud scheme, saying, "I got this new
4 thing where I can make you make some change . . . everybody doin' it
5 . . . the EDD thing."

6 Overt Act No. 40: On July 11, 2020, defendant J. JOHNSON,
7 using an EDD debit card ending in 1940, issued in the name of victim
8 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
9 California.

10 Overt Act No. 41: On July 11, 2020, defendant J. JOHNSON,
11 using an EDD debit card ending in 6137, issued in the name of victim
12 D.F., withdrew \$1,000 from a Bank of America ATM in Wilmington,
13 California.

14 Overt Act No. 42: On July 12, 2020, defendant J. JOHNSON,
15 using an EDD debit card ending in 1940, issued in the name of victim
16 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
17 California.

18 Overt Act No. 43: On July 12, 2020, defendant J. JOHNSON,
19 using an EDD debit card ending in 6137, issued in the name of victim
20 D.F., withdrew \$1,000 from a Bank of America ATM in Wilmington,
21 California.

22 Overt Act No. 44: On July 13, 2020, defendant J. JOHNSON,
23 using an EDD debit card ending in 6137, issued in the name of victim
24 D.F., withdrew \$1,000 from a Bank of America ATM in Wilmington,
25 California.

26 Overt Act No. 45: On July 13, 2020, coconspirators
27 electronically filed an application for pandemic assistance benefits
28 in the name of victim T.R.S., which was approved.

1 Overt Act No. 46: On July 13, 2020, coconspirators
2 electronically filed an application for pandemic assistance benefits
3 in the name of victim D.M.B., an inmate within the CDCR prison
4 system, which was approved.

5 Overt Act No. 47: On July 14, 2020, defendant J. JOHNSON,
6 using an EDD debit card ending in 1940, issued in the name of victim
7 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
8 California.

9 Overt Act No. 48: On July 14, 2020, defendant MITCHELL, using
10 an EDD debit card ending in 9830, issued in the name of victim
11 S.M.R., withdrew \$1,000 from a Bank of America ATM in Gardena,
12 California.

13 Overt Act No. 49: On July 14, 2020, defendant MARTIN, using an
14 EDD debit card ending in 9975, issued in the name of victim K.S.R.,
15 withdrew \$503 from a Chase Bank ATM in Yucaipa, California.

16 Overt Act No. 50: On July 14, 2020, defendant MITCHELL, using
17 an EDD debit card ending in number 0868, issued in the name of victim
18 M.D.J., withdrew \$1,000 from a Bank of America ATM in Gardena,
19 California.

20 Overt Act No. 51: On July 14, 2020, defendant MITCHELL, using
21 an EDD debit card ending in number 8064, issued in the name of victim
22 K.S., withdrew \$1,000 from a Bank of America ATM in Gardena,
23 California.

24 Overt Act No. 52: On July 15, 2020, defendant MITCHELL, using
25 an EDD debit card ending in 1414, issued in the name of defendant
26 PLUMMER, withdrew \$1,000 from a Bank of America ATM in Victorville,
27 California.

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1 Overt Act No. 53: On July 15, 2020, coconspirators
2 electronically filed an application for pandemic assistance benefits
3 in the name of victim M.P., an inmate in the CDCR prison system,
4 which was approved.

5 Overt Act No. 54: On July 15, 2020, defendant J. JOHNSON,
6 using an EDD debit card ending in number 6137, issued in the name of
7 victim D.F., withdrew \$1,000 from a Bank of America ATM in Los
8 Angeles, California.

9 Overt Act No. 55: On July 16, 2020, defendant J. JOHNSON,
10 using an EDD debit card ending in 6137, issued in the name of victim
11 D.F., withdrew \$1,000 from a Bank of America ATM in Wilmington,
12 California.

13 Overt Act No. 56: On July 16, 2020, defendant J. JOHNSON,
14 using an EDD debit card ending in 1940, issued in the name of victim
15 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
16 California.

17 Overt Act No. 57: On July 16, 2020, defendant F. KING, using
18 an EDD debit card ending in 8925, issued in the name of defendant
19 K. KING, withdrew \$1,000 from a Bank of America ATM in Gardena,
20 California.

21 Overt Act No. 58: On July 17, 2020, defendant J. JOHNSON,
22 using an EDD debit card ending in 6137, issued in the name of victim
23 D.F., withdrew \$1,000 from a Bank of America ATM in Wilmington,
24 California.

25 Overt Act No. 59: On July 17, 2020, defendant J. JOHNSON,
26 using an EDD debit card ending in 1940, issued in the name of victim
27 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
28 California.

1 Overt Act No. 60: On July 18, 2020, defendant J. JOHNSON,
2 using an EDD debit card ending in 1940, issued in the name of victim
3 M.D.S., withdrew \$1,000 from a Bank of America ATM in Wilmington,
4 California.

5 Overt Act No. 61: On July 20, 2020, defendant MITCHELL, using
6 an EDD debit card ending in number 6350, issued in the name of victim
7 A.A.M., withdrew \$1,000 from a Bank of America ATM in Walnut Park,
8 California.

9 Overt Act No. 62: On July 22, 2020, in an email exchange
10 between defendant J. JOHNSON and defendant DEMOLA regarding a new
11 application for pandemic assistance benefits, defendant J. JOHNSON
12 requested permission to withdraw money, defendant DEMOLA instructed
13 defendant J. JOHNSON on the amount of money to withdraw, and
14 defendant J. JOHNSON asked for instructions on how to set up account
15 security features.

16 Overt Act No. 63: On July 24, 2020, defendant MITCHELL, using
17 an EDD debit card ending in 3349, issued in the name of victim
18 M.C.B., withdrew \$1,000 from a Bank of America ATM in Torrance,
19 California.

20 Overt Act No. 64: On July 25, 2020, coconspirators
21 electronically filed an application for pandemic assistance benefits
22 in the name of victim M.J.W., using PII in defendant K. KING's
23 notebooks.

24 Overt Act No. 65: On July 26, 2020, coconspirators
25 electronically filed an application for pandemic assistance benefits
26 in the name of victim M.Si., using PII in defendant K. KING's
27 notebooks.

28

1 Overt Act No. 66: On July 26, 2020, defendant DEMOLA emailed
2 defendant PLUMMER several usernames and passwords for EDD debit
3 accounts, including the account relating to victim D.F.

4 Overt Act No. 67: On July 27, 2020, defendant DEMOLA emailed
5 defendant PLUMMER usernames and passwords for EDD debit accounts.

6 Overt Act No. 68: On July 30, 2020, defendant DEMOLA emailed
7 defendant PLUMMER usernames and passwords for EDD debit accounts,
8 including the accounts relating to victims D.F. and M.D.S.

9 Overt Act No. 69: On August 2, 2020, defendant DAVIS, using an
10 EDD debit card ending in 5658, issued in the name of victim A.M.P.,
11 withdrew \$1,000 from a Bank of America ATM in Inglewood, California.

12 Overt Act No. 70: On August 2, 2020, defendant DAVIS, using an
13 EDD debit card ending in 6256, issued in the name of victim T.R.S.,
14 withdrew \$1,000 from a Bank of America ATM in Victorville,
15 California.

16 Overt Act No. 71: On August 2, 2020, defendant DAVIS, using an
17 EDD debit card ending in 5325, issued in the name of victim D.M.B.,
18 withdrew \$1,000 from a Bank of America ATM in Victorville,
19 California.

20 Overt Act No. 72: On August 2, 2020, defendant DAVIS, using an
21 EDD debit card ending in 4935, issued in the name of victim M.P.,
22 withdrew \$1,000 from a Bank of America ATM in Victorville,
23 California.

24 Overt Act No. 73: On August 4, 2020, coconspirators
25 electronically filed an application for pandemic assistance benefits
26 in the name of victim S.M., an inmate in the CDCR prison system,
27 which was approved.

28

1 Overt Act No. 74: On August 4, 2020, defendant DAVIS, using an
2 EDD debit card ending in 4935, issued in the name of victim M.P.,
3 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
4 California.

5 Overt Act No. 75: On August 4, 2020, defendant DAVIS, using an
6 EDD debit card ending in 4078, issued in the name of victim I.T.C.,
7 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
8 California.

9 Overt Act No. 76: On August 4, 2020, defendant DAVIS, using an
10 EDD debit card ending in 5325, issued in the name of victim D.M.B.,
11 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
12 California.

13 Overt Act No. 77: On August 4, 2020, coconspirators
14 electronically filed an application for pandemic assistance benefits
15 in the name of victim C.M.G., an inmate within the CDCR prison
16 system, which was approved.

17 Overt Act No. 78: On August 4, 2020, coconspirators
18 electronically filed an application for pandemic assistance benefits
19 in the name of victim R.J., an inmate within the CDCR prison system,
20 which was approved.

21 Overt Act No. 79: On August 5, 2020, defendant DAVIS, using an
22 EDD debit card ending in 4935, issued in the name of victim M.P.,
23 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
24 California.

25 Overt Act No. 80: On August 5, 2020, defendant DAVIS, using an
26 EDD debit card ending in 5325, issued in the name of victim D.M.B.,
27 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
28 California.

1 Overt Act No. 81: On August 6, 2020, defendant DAVIS, using an
2 EDD debit card ending in 6256, issued in the name of victim T.R.S.,
3 withdrew \$1,000 from a Bank of America ATM in El Segundo, California.

4 Overt Act No. 82: On August 6, 2020, defendant DAVIS using an
5 EDD debit card ending in 6041, issued in the name of victim T.K.J.,
6 withdrew \$500 from a Bank of America ATM in El Segundo, California.

7 Overt Act No. 83: On August 6, 2020, defendant DAVIS, using an
8 EDD debit card ending in 5325, issued in the name of victim D.M.B.,
9 withdrew \$1,000 from a Bank of America ATM in Los Angeles,
10 California.

11 Overt Act No. 84: On August 7, 2020, defendant ROBERTSON,
12 using an EDD debit card ending in number 4502, issued in the name of
13 victim D.D.J., withdrew \$1,000 from a Bank of America ATM in Downey,
14 California.

15 Overt Act No. 85: On August 7, 2020, defendant ROBERTSON,
16 using an EDD debit card ending in number 6350, issued in the name of
17 victim A.A.M., withdrew \$1,000 from a Bank of America ATM in Downey,
18 California.

19 Overt Act No. 86: On August 7, 2020, defendant ROBERTSON,
20 using an EDD debit card ending in number 8064, issued in the name of
21 victim K.S., withdrew \$1,000 from a Bank of America ATM in Downey,
22 California.

23 Overt Act No. 87: On August 8, 2020, coconspirators
24 electronically filed an application for pandemic assistance benefits
25 in the name of victim R.M.W., using PII in defendant K. KING's
26 notebooks.

27 Overt Act No. 88: On August 8, 2020, defendant PLUMMER, using
28 an EDD debit card ending in 4078, issued in the name of victim

1 I.T.C., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
2 California.

3 Overt Act No. 89: On August 9, 2020, coconspirators
4 electronically filed an application for pandemic assistance benefits
5 in the name of victim R.J.W., using PII in defendant K. KING's
6 notebooks.

7 Overt Act No. 90: On August 13, 2020, coconspirators
8 electronically filed an application for pandemic assistance benefits
9 in the name of victim S.R.S., using PII in defendant K. KING's
10 notebooks.

11 Overt Act No. 91: On August 13, 2020, coconspirators
12 electronically filed an application for pandemic assistance benefits
13 in the name of victim N.T.S., using PII in defendant K. KING's
14 notebooks.

15 Overt Act No. 92: On August 13, 2020, defendant P. JOHNSON,
16 using an EDD debit card ending in 5617, issued in the name of victim
17 S.M., withdrew \$900 from a Bank of America ATM in Gardena,
18 California.

19 Overt Act No. 93: On August 14, 2020, coconspirators
20 electronically filed an application for pandemic assistance benefits
21 in the name of victim D.S.S., which was approved.

22 Overt Act No. 94: On August 15, 2020, coconspirators
23 electronically filed an application for pandemic assistance benefits
24 in the name of victim S.N.W., using PII in defendant K. KING's
25 notebooks.

26 Overt Act No. 95: On August 15, 2020, coconspirators
27 electronically filed an application for pandemic assistance benefits
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1 in the name of victim J.S., using PII in defendant K. KING's
2 notebooks.

3 Overt Act No. 96: On August 16, 2020, defendant PLUMMER, using
4 an EDD debit card ending in 1245, issued in the name of victim G.G.,
5 withdrew \$1,000 from a Bank of America ATM in Victorville,
6 California.

7 Overt Act No. 97: On August 18, 2020, coconspirators
8 electronically filed an application for pandemic assistance benefits
9 in the name of victim O.D.S., using PII in defendant K. KING's
10 notebooks.

11 Overt Act No. 98: On August 18, 2020, defendant C. JOHNSON,
12 using an EDD debit card ending in 4935, issued in the name of victim
13 M.P., withdrew \$500 from a Bank of America ATM in Hawthorne,
14 California.

15 Overt Act No. 99: On August 18, 2020, coconspirators
16 electronically filed an application for pandemic assistance benefits
17 in the name of victim D.Fo., an inmate within the CDCR prison system,
18 which was approved.

19 Overt Act No. 100: On August 18, 2020, coconspirators
20 electronically filed an application for pandemic assistance benefits
21 in the name of victim T.A.W., an inmate within the CDCR prison
22 system, which was approved.

23 Overt Act No. 101: On August 20, 2020, defendant C. JOHNSON,
24 using an EDD debit card ending in 4935, issued in the name of victim
25 M.P., withdrew \$1,000 from a Bank of America ATM in Hawthorne,
26 California.

27 Overt Act No. 102: On or before August 20, 2020, defendants
28 PLUMMER and C. JOHNSON purchased from T-Mobile cell phones that

1 defendants used to store and access fraudulent EDD account
2 information.

3 Overt Act No. 103: On August 21, 2020, coconspirators
4 electronically filed an application for pandemic assistance benefits
5 in the name of victim B.S., using PII in defendant K. KING's
6 notebooks.

7 Overt Act No. 104: On August 21, 2020, Coconspirator 2, using
8 an EDD debit card ending in number 4935, issued in the name of victim
9 M.P., withdrew \$650 from a Bank of America ATM in Los Angeles,
10 California.

11 Overt Act No. 105: On August 23, 2020, defendant PACE, using an
12 EDD debit card ending in 0241, a replacement card issued in the name
13 of victim M.D.J., withdrew \$800 from a Bank of America ATM in Los
14 Angeles, California.

15 Overt Act No. 106: On August 24, 2020, coconspirators
16 electronically filed an application for pandemic assistance benefits
17 in the name of victim D.L.S., using PII in defendant K. KING's
18 notebooks.

19 Overt Act No. 107: On August 24, 2020, defendant PLUMMER, using
20 an EDD debit card ending in number 3004, issued in the name of victim
21 N.M.S., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
22 California.

23 Overt Act No. 108: On August 25, 2020, coconspirators
24 electronically filed an application for pandemic assistance benefits
25 in the name of victim R.L.S., using PII in defendant K. KING's
26 notebooks.

27 Overt Act No. 109: On August 25, 2020, defendant PLUMMER, using
28 an EDD debit card ending in 6256, issued in the name of victim

1 T.R.S., withdrew \$1,000 from a Bank of America ATM in Apple Valley,
2 California.

3 Overt Act No. 110: On August 26, 2020, coconspirators
4 electronically filed an application for pandemic assistance benefits
5 in the name of victim M.A.W., using PII in defendant K. KING's
6 notebooks.

7 Overt Act No. 111: On August 26, 2020, coconspirators
8 electronically filed an application for pandemic assistance benefits
9 in the name of victim D.J.S., using PII in defendant K. KING's
10 notebooks.

11 Overt Act No. 112: On August 26, 2020, coconspirators
12 electronically filed an application for pandemic assistance benefits
13 in the name of victim W.J.S., using PII in defendant K. KING's
14 notebooks.

15 Overt Act No. 113: On August 27, 2020, defendant F. KING, using
16 an EDD debit card ending in 6127, issued in the name of victim D.Fo.,
17 an inmate in the CDCR prison system, withdrew \$1,000 from a Bank of
18 America ATM in Los Angeles, California.

19 Overt Act No. 114: On August 31, 2020, defendant WADE, using an
20 EDD debit card ending in number 7456, issued in the name of victim
21 N.T.S., withdrew \$1,000 from a Bank of America ATM in Palmdale,
22 California.

23 Overt Act No. 115: On September 1, 2020, defendant C. JOHNSON,
24 using an EDD debit card ending in number 4935, issued in the name of
25 victim M.P., withdrew \$1,000 from a Bank of America ATM in Los
26 Angeles, California.

27 Overt Act No. 116: On September 2, 2020, defendant F. KING,
28 using an EDD debit card ending in 6127, issued in the name of victim

1 D.Fo., an inmate in the CDCR prison system, withdrew \$1,000 from a
2 Bank of America ATM in Bell, California.

3 Overt Act No. 117: On September 2, 2020, defendant F. KING,
4 using an EDD debit card ending in 5884, issued in the name of victim
5 T.A.W., withdrew \$1,000 from a Bank of America ATM in South Gate,
6 California.

7 Overt Act No. 118: On September 5, 2020, defendant K. KING,
8 using an EDD debit card ending in number 5755, issued in the name of
9 victim P.G.W., withdrew \$1,003 from a Wells Fargo ATM in Los Angeles,
10 California.

11 Overt Act No. 119: On September 6, 2020, defendant K. KING,
12 using an EDD debit card ending in number 9562, issued in the name of
13 victim J.J.W., withdrew \$803 from a Wells Fargo ATM in Westchester,
14 California.

15 Overt Act No. 120: On September 6, 2020, defendant K. KING,
16 using an EDD debit card ending in number 7371, issued in the name of
17 victim L.Si., withdrew \$1,003 from a Wells Fargo ATM in Hawthorne,
18 California.

19 Overt Act No. 121: On September 6, 2020, defendant F. KING,
20 using an EDD debit card ending in 1277, issued in the name of victim
21 D.S.S., withdrew \$1,000 from a Bank of America ATM in Lakewood,
22 California.

23 Overt Act No. 122: On September 6, 2020, Coconspirator 3, using
24 an EDD debit card ending in number 6127, issued in the name of victim
25 D.Fo., withdrew \$1,000 from a Bank of America ATM in Lancaster,
26 California.

27 Overt Act No. 123: On September 6, 2020, defendants K. KING and
28 C. JOHNSON possessed EDD mail addressed to victims, and EDD debit

1 cards issued to victims, including EDD debit cards issued in the
2 names of victims S.M., C.M.G., R.J.W., S.R.S., and M.P.

3 Overt Act No. 124: On September 6, 2020, defendant K. KING and
4 C. JOHNSON possessed two notebooks containing 98 PII profiles,
5 including victims' names, dates of birth, and social security
6 numbers.

7 Overt Act No. 125: On September 6, 2020, defendants K. KING and
8 C. JOHNSON possessed cell phones that they used to store fraudulent
9 EDD pandemic benefits account information.

10 Overt Act No. 126: On September 6, 2020, in a hotel room,
11 defendants K. KING and C. JOHNSON possessed EDD mail addressed to
12 victims and an EDD debit card in the name of victim S.W.

13 Overt Act No. 127: On September 7, 2020, Coconspirator 3, using
14 an EDD debit card ending in number 6127, issued in the name of victim
15 D.Fo., withdrew \$1,000 from a Bank of America ATM in Lancaster,
16 California.

17 Overt Act No. 128: On September 7, 2020, defendant WADE using
18 an EDD debit card ending in number 7456, issued in the name of victim
19 N.T.S., withdrew \$1,000 from a Bank of America ATM in Palmdale,
20 California.

21 Overt Act No. 129: On September 9, 2020, defendant F. KING,
22 using an EDD debit card ending in number 1277, issued in the name of
23 victim D.S.S., withdrew \$1,000 from a Bank of America ATM in Los
24 Angeles, California.

25 Overt Act No. 130: On September 10, 2020, defendant F. KING,
26 using an EDD debit card ending in 5561, issued in the name of victim
27 R.J., withdrew \$200 from a Bank of America ATM in Gardena,
28 California.

1 Overt Act No. 131: On September 13, 2020, defendant F. KING,
2 using an EDD debit card ending in 1277, issued in the name of victim
3 D.S.S., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
4 California.

5 Overt Act No. 132: On September 15, 2020, defendant C. JOHNSON,
6 using an EDD debit card ending in 6078, issued in the name of victim
7 A.R.C., withdrew \$1,000 from a Bank of America ATM in Marina Del Rey,
8 California.

9 Overt Act No. 133: On September 16, 2020, defendant C. JOHNSON,
10 using an EDD debit card ending in 6078, issued in the name of victim
11 A.R.C., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
12 California.

13 Overt Act No. 134: On September 20, 2020, defendant F. KING,
14 using an EDD debit card ending in 6127, issued in the name of victim
15 D.Fo., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
16 California.

17 Overt Act No. 135: On September 25, 2020, defendant WADE, using
18 an EDD debit card ending in number 7456, issued in the name of victim
19 N.T.S., withdrew \$1,000 from a Bank of America ATM in Palmdale,
20 California.

21 Overt Act No. 136: On September 27, 2020, defendant C. JOHNSON,
22 using an EDD debit card ending in 6078, issued in the name of victim
23 A.R.C., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
24 California.

25 Overt Act No. 137: On October 5, 2020, defendant PLUMMER, using
26 an EDD debit card ending in 9830, issued in the name of victim
27 S.M.R., withdrew \$320 from a Bank of America ATM in Apple Valley,
28 California.

1 Overt Act No. 138: On October 7, 2020, Coconspirator 4, using
2 an EDD debit card ending in number 8908, issued in the name of victim
3 A.M.S., withdrew \$900 from a Bank of America ATM in Van Nuys,
4 California.

5 Overt Act No. 139: On October 11, 2020, defendant F. KING,
6 using an EDD debit card ending in 5561, issued in the name of victim
7 R.J., withdrew \$360 from a Bank of America ATM in Los Angeles,
8 California.

9 Overt Act No. 140: On October 12, 2020, defendant PACE, using
10 an EDD debit card ending in 0241, a replacement card issued in the
11 name of victim M.D.J., withdrew \$1,000 from a Bank of America ATM in
12 Gardena, California.

13 Overt Act No. 141: On October 12, 2020, defendant PLUMMER,
14 using an EDD debit card ending in number 6320, issued in the name of
15 victim F.S., withdrew \$1,000 from a Bank of America ATM in
16 Victorville, California.

17 Overt Act No. 142: On October 13, 2020, defendant PLUMMER,
18 using an EDD debit card ending in number 6256, issued in the name of
19 victim T.R.S., withdrew \$900 from a Bank of America ATM in
20 Victorville, California.

21 Overt Act No. 143: On October 14, 2020, Coconspirator 2, using
22 an EDD debit card ending in number 6078, issued in the name of victim
23 A.R.C., withdrew \$500 from a Bank of America ATM in Los Angeles,
24 California.

25 Overt Act No. 144: On October 16, 2020, defendant C. JOHNSON,
26 using an EDD debit card ending in 6078, issued in the name of victim
27 A.R.C., withdrew \$1,000 from a Bank of America ATM in Los Angeles,
28 California.

1 Overt Act No. 145: On October 16, 2020, defendant PLUMMER,
2 using an EDD debit card ending in 8881, issued in the name of
3 defendant DEMOLA, withdrew \$1,000 from a Bank of America ATM in
4 Victorville, California.

5 Overt Act No. 146: On October 23, 2020, defendant PLUMMER,
6 using an EDD debit card ending in 8881, issued in the name of
7 defendant DEMOLA, withdrew \$880 from a Bank of America ATM in
8 Victorville, California.

9 Overt Act No. 147: On October 27, 2020, Coconspirator 4, using
10 an EDD debit card ending in number 8908, issued in the name of victim
11 A.M.S., withdrew \$900 from a Bank of America ATM in Van Nuys,
12 California.

13 Overt Act No. 148: On November 7, 2020, Coconspirator 4, using
14 an EDD debit card ending in number 8908, issued in the name of victim
15 A.M.S., withdrew \$900 from a Bank of America ATM in Van Nuys,
16 California.

17 Overt Act No. 149: On December 22, 2020, defendant MARTIN
18 received EDD mail addressed to victim K.S.R.

19 Overt Act No. 150: On April 12, 2021, defendant MARTIN received
20 EDD mail addressed to victim M.M.

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COUNTS TWO THROUGH THIRTY-TWO

[18 U.S.C. §§ 1344(2), 2(a), 2(b)]

[ALL DEFENDANTS]

13. The Grand Jury re-alleges paragraphs 1 through 9, 11, and 12 of this Indictment here.

A. THE SCHEME TO DEFRAUD

14. Beginning on a date unknown to the Grand Jury, but no later than in or around June 2020, and continuing until in or around April 2021, in Los Angeles, Riverside, Ventura, and San Bernardino Counties, within the Central District of California, and elsewhere, defendants NATALIE LE DEMOLA ("DEMOLA"), CARLEISHA NEOSHA PLUMMER, also known as ("aka") "LG" ("PLUMMER"), KHANSHANDA EUGENA KING, aka "Cassandra King" ("K. KING"), aka "Cassandra King," CLESHAY JOHNSON II ("C. JOHNSON"), JAMES ANTONIO JOHNSON, aka "Niddy Johnson," aka "Big Dawg Niddy," aka "Niddy" ("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"), together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, participated in, and executed a scheme to obtain moneys, funds, credits, assets, and other property owned by and in the custody and control of federally-insured financial institutions by means of material false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

15. The fraudulent scheme operated and was carried out, in substance, as described in paragraph 11 of this Indictment.

1 B. EXECUTIONS OF THE SCHEME

2 16. On or about the following dates, in Los Angeles, Riverside,
3 Ventura, and San Bernardino Counties, within the Central District of
4 California, and elsewhere, defendants DEMOLA, PLUMMER, K. KING,
5 C. JOHNSON, J. JOHNSON, F. KING, MITCHELL, DAVIS, P. JOHNSON, PACE,
6 MARTIN, ROBERTSON, and WADE, together with others known and unknown
7 to the Grand Jury, aiding and abetting each other, committed and
8 willfully caused others to commit the following acts, each of which
9 constituted an execution of the fraudulent scheme:

COUNT	DEFENDANT (S)	DATE	ACT
TWO	MARTIN	June 24, 2020	Use of an EDD debit card ending in 9975 issued in the name of K.S.R, at Chase to withdraw \$503, in Yucaipa, California.
THREE	DEMOLA; J. JOHNSON; MARTIN	July 10, 2020	Use of an EDD debit card ending in 1940, issued in the name of M.D.S., at Bank of America to withdraw \$1,000, in Wilmington, California.
FOUR	DEMOLA; J. JOHNSON	July 11, 2020	Use of an EDD debit card ending in 6137, issued in the name of D.F., at Bank of America to withdraw \$1,000, in Wilmington, California.
FIVE	MITCHELL	July 14, 2020	Use of an EDD debit card ending in 0868, issued in the name of M.D.J., at Bank of America to withdraw \$1,000, in Gardena, California.

COUNT	DEFENDANT (S)	DATE	ACT
SIX	MITCHELL	July 14, 2020	Use of an EDD debit card ending in 8064, issued in the name of K.S., at Bank of America to withdraw \$1,000, in Gardena, California.
SEVEN	DEMOLA; J. JOHNSON	July 15, 2020	Use of an EDD debit card ending in 6137, issued in the name of D.F., at Bank of America to withdraw \$1,000, in Wilmington, California.
EIGHT	MITCHELL	July 20, 2020	Use of an EDD debit card ending in 6350, issued in the name of A.A.M., at Bank of America to withdraw \$1,000, in Walnut Park, California.
NINE	DAVIS	August 2, 2020	Use of an EDD debit card ending in 5325, issued in the name of D.M.B., at Bank of America to withdraw \$1,000, in Victorville, California.
TEN	DAVIS	August 2, 2020	Use of an EDD debit card ending in 4935, issued in the name of M.P., at Bank of America to withdraw \$1,000, in Victorville, California.
ELEVEN	DAVIS	August 2, 2020	Use of an EDD debit card ending in 6256, issued in the name of T.R.S., at Bank of America to withdraw \$1,000, in Victorville, California.

COUNT	DEFENDANT (S)	DATE	ACT
TWELVE	ROBERTSON	August 7, 2020	Use of an EDD debit card ending in 4502, issued in the name of D.D.J., at Bank of America to withdraw \$1,000, in Downey, California.
THIRTEEN	ROBERTSON	August 7, 2020	Use of an EDD debit card ending in 6350, issued in the name of A.A.M., at Bank of America to withdraw \$1,000, in Downey, California.
FOURTEEN	ROBERTSON	August 7, 2020	Use of an EDD debit card ending in 8064, issued in the name of K.S., at Bank of America to withdraw \$1,000, in Downey, California.
FIFTEEN	P. JOHNSON	August 13, 2020	Use of an EDD debit card ending in 5617, issued in the name of S.M., at Bank of America to withdraw \$900, in Gardena, California.
SIXTEEN	C. JOHNSON	August 18, 2020	Use of an EDD debit card ending in 4935, issued in the name of M.P., at Bank of America to withdraw \$500, in Hawthorne, California.
SEVENTEEN	PACE	August 23, 2020	Use of an EDD debit card ending in 0241, issued in the name of M.D.J., at Bank of America to withdraw \$800, in Los Angeles, California.

COUNT	DEFENDANT (S)	DATE	ACT
EIGHTEEN	PLUMMER	August 24, 2020	Use of an EDD debit card ending in 3004, issued in the name of N.M.S., at Bank of America to withdraw \$1,000, in Los Angeles, California.
NINETEEN	WADE	August 31, 2020	Use of an EDD debit card ending in 7456, issued in the name of N.T.S., at Bank of America to withdraw \$1,000, in Palmdale, California.
TWENTY	C. JOHNSON	September 1, 2020	Use of an EDD debit card ending in 4935, issued in the name of M.P., at Bank of America to withdraw \$1,000, in Los Angeles, California.
TWENTY-ONE	K. KING	September 5, 2020	Use of an EDD debit card ending in 5755, issued in the name of P.G.W., at Wells Fargo to withdraw \$1,003, in Los Angeles, California.
TWENTY-TWO	F. KING	September 6, 2020	Use of an EDD debit card ending in 1277, issued in the name of D.S.S., at Bank of America to withdraw \$1,000, in Lakewood, California.
TWENTY-THREE	K. KING	September 6, 2020	Use of an EDD debit card ending in 9562, issued in the name of J.J.W., at Wells Fargo to withdraw \$803, in Westchester, California.

COUNT	DEFENDANT (S)	DATE	ACT
TWENTY-FOUR	K. KING	September 6, 2020	Use of an EDD debit card ending in 7371, issued in the name of L.Si., at Wells Fargo to withdraw \$1,003, in Hawthorne, California.
TWENTY-FIVE	WADE	September 7, 2020	Use of an EDD debit card ending in 7456, issued in the name of N.T.S., at Bank of America to withdraw \$1,000, in Palmdale, California.
TWENTY-SIX	F. KING	September 9, 2020	Use of an EDD debit card ending in 1277, issued in the name of D.S.S., at Bank of America to withdraw \$1,000, in Los Angeles, California.
TWENTY-SEVEN	F. KING	September 10, 2020	Use of an EDD debit card ending in 5561, issued in the name of R.J., at Bank of America to withdraw \$1,000, in Gardena, California.
TWENTY-EIGHT	WADE	September 25, 2020	Use of an EDD debit card ending in 7456, issued in the name of N.T.S., at Bank of America to withdraw \$1,000, in Palmdale, California.
TWENTY-NINE	PLUMMER	October 12, 2020	Use of an EDD debit card ending in 6320, issued in the name of F.S., at Bank of America to withdraw \$1,000, in Victorville, California.

COUNT	DEFENDANT (S)	DATE	ACT
THIRTY	PACE	October 12, 2020	Use of an EDD debit card ending in 0241, issued in the name of M.D.J., at Bank of America to withdraw \$1,000, in Gardena, California.
THIRTY-ONE	PLUMMER	October 13, 2020	Use of an EDD debit card ending in 6256, issued in the name of T.R.S., at Bank of America to withdraw \$900, in Victorville, California.
THIRTY-TWO	C. JOHNSON	October 16, 2020	Use of an EDD debit card ending in 6078, issued in the name of A.R.C., at Bank of America to withdraw \$1,000, in Los Angeles, California.

COUNTS THIRTY-THREE THROUGH THIRTY-NINE

[18 U.S.C. §§ 1028A(a)(1), 2(b)]

[DEFENDANTS DEMOLA, PLUMMER, K. KING, F. KING, MITCHELL, P. JOHNSON,
AND MARTIN]

17. The Grand Jury re-alleges paragraphs 1 through 9 and 11 of this Indictment here.

18. Beginning no later than in or around June 2020, and continuing until in or around April 2021, in Los Angeles, Riverside, Ventura, and San Bernardino Counties, within the Central District of California, and elsewhere, defendants NATALIE LE DEMOLA ("DEMOLA"), CARLEISHA NEOSHA PLUMMER, also known as "LG" ("PLUMMER"), KHANSHANDA EUGENA KING, aka "Cassandra King" ("K. KING"), FELICITE ALEISHA KING ("F. KING"), SHAFEQUAH LYNETE MITCHELL ("MITCHELL"), PORSHA LATRICE JOHNSON ("P. JOHNSON"), and DOMINIQUE CHARMONE MARTIN ("MARTIN"), on or about the following dates, knowingly transferred, possessed, and used, and willfully caused to be transferred, possessed, and used, without lawful authority, means of identification that defendants knew belonged to other persons, namely, the names and EDD Bank of America account numbers of the individuals identified below, during and in relation to conspiracy to commit wire fraud and bank fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in Count One of this Indictment.

COUNT	DEFENDANT	DATE RANGE	MEANS OF IDENTIFICATION
THIRTY-THREE	DEMOLA	6/23/2020 to 7/18/2020	Names and EDD Bank of America account numbers in the names of M.D.S. and D.F.

COUNT	DEFENDANT	DATE RANGE	MEANS OF IDENTIFICATION
THIRTY-FOUR	PLUMMER	8/8/2020 to 10/23/2020	Names and EDD Bank of America account numbers in the names of N.M.S., F.S., T.R.S., and defendant DEMOLA
THIRTY-FIVE	K. KING	9/4/2020 to 9/6/2020	Names and EDD Bank of America account numbers in the names of P.G.W., J.J.W., and L.Si.
THIRTY-SIX	F. KING	7/16/2020 to 10/11/2020	Names and EDD Bank of America account numbers in the names of D.S.S., R.J., and defendant K. KING
THIRTY-SEVEN	MITCHELL	6/27/2020 to 7/20/20	Names and EDD Bank of America account numbers in the names of M.D.J., K.S., A.A.M., and defendant PLUMMER
THIRTY-EIGHT	P. JOHNSON	7/23/2020 to 8/13/2020	Names and EDD Bank of America account numbers in the names of S.M. and defendant K. KING
THIRTY-NINE	MARTIN	6/24/2020 to 7/14/2020	Names and EDD Bank of America account numbers in the names of K.S.R. and M.D.S.

FORFEITURE ALLEGATION

[18 U.S.C. § 982]

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2
3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal
4 Procedure, notice is hereby given that the United States of America
5 will seek forfeiture as part of any sentence, pursuant to Title 18,
6 United States Code, Section 982(a)(2), in the event of any
7 defendant's conviction of the offenses set forth in any of Counts One
8 through Thirty Nine of this Indictment.

9 2. Any defendant so convicted shall forfeit to the United
10 States of America the following:

11 (a) All right, title and interest in any and all property,
12 real or personal, constituting, or derived from, any proceeds
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for
15 forfeiture, a sum of money equal to the total value of the property
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p),
18 as incorporated by Title 18, United States Code, Section 982(b), any
19 defendant so convicted shall forfeit substitute property, up to the
20 total value of the property described in the preceding paragraph if,
21 as the result of any act or omission of said defendant, the property
22 described in the preceding paragraph, or any portion thereof: (a)
23 cannot be located upon the exercise of due diligence; (b) has been
24 transferred, sold to or deposited with a third party; (c) has been
25 placed beyond the jurisdiction of the court; (d) has been

26 //

27 //

28 //

1 substantially diminished in value; or (e) has been commingled with
2 other property that cannot be divided without difficulty.

3
4 A TRUE BILL

5
6 /S/

7
8 _____
9 Foreperson

8 TRACY L. WILKISON
9 United States Attorney

10 

11 SCOTT M. GARRINGER
12 Assistant United States Attorney
13 Chief, Criminal Division

14 JOSHUA O. MAUSNER
15 Assistant United States Attorney
16 Deputy Chief, General Crimes
17 Section

18 GREGORY BERNSTEIN
19 Assistant United States Attorney
20 Major Frauds Section
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