

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	No. 15 CR 351
v.)	
)	Violations: Title 18, United States Code,
LEONARD E. PARKER, JR., and)	Sections 287, 1028A(a)(1),
DONTREAL S. EVANS,)	and 1344
also known as "Moose")	

COUNT ONE

The SPECIAL FEBRUARY 2014 GRAND JURY charges:

1. At times material to this indictment,
 - a. Navy Federal Credit Union was a financial institution with branches in Great Lakes, Illinois, and elsewhere, and the accounts of Navy Federal Credit Union were insured by the National Credit Union Share Insurance Fund.
 - b. Combat Logistics Regiment-3 ("CLR-3") was a unit of the United States Marine Corps located at Camp Foster in Okinawa, Japan. Defendant LEONARD E. PARKER, JR., Marines NK, ML, AT, JT, RN, DR, MA, AW, and RV, and others, were members of CLR-3.
2. Beginning no later than in or about January 2013 and continuing through at least in or about August 2014, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR. and
DONTREAL S. EVANS, also known as "Moose,"

defendants herein, and others known and unknown to the Grand Jury, knowingly participated in a scheme to defraud a financial institution and to obtain money and funds owned by and under the custody and control of a financial institution by means of materially false and fraudulent pretenses, representations, and promises, which scheme is further described below.

3. It was part of the scheme that defendants LEONARD E. PARKER, JR. and DONTREAL S. EVANS (also known as “Moose”) fraudulently caused Navy Federal Credit Union to transfer approximately \$138,798 from accounts belonging to Marines who had been members of CLR-3 into other Navy Federal Credit Union accounts, without the knowledge or authorization of the true Marine account holders. PARKER and EVANS later withdrew funds and made purchases from the accounts into which the fraudulent transfers were made, and kept the proceeds of the scheme.

4. It was further part of the scheme that, while he was stationed in Okinawa, Japan, defendant PARKER obtained a Marine Corps roster that contained identifying information, including names, Social Security numbers, and dates of birth, for Marines who were members of CLR-3 (“the CLR-3 roster”).

5. It was further part of the scheme that defendant PARKER used the information on the CLR-3 roster, including the names, Social Security numbers, and dates of birth of Marines who were listed on the CLR-3 roster, to access Navy

Federal Credit Union accounts belonging to those Marines, without the knowledge or authorization of the Marine account holders.

6. It was further part of the scheme that defendants PARKER and EVANS recruited and offered to pay individuals to open accounts at Navy Federal Credit Union, and to allow PARKER and EVANS to access and control the Navy Federal Credit Union accounts of the individuals they recruited.

7. It was further part of the scheme that defendants PARKER and EVANS caused the recruited account holders to deliver debit cards issued by Navy Federal Credit Union in connection with the accounts to PARKER and EVANS.

8. It was further part of the scheme that, after fraudulently gaining access to the Marines' Navy Federal Credit Union accounts, defendants PARKER and EVANS fraudulently caused funds to be transferred from the Marines' accounts into Navy Federal Credit Union accounts accessed and controlled by defendants, including accounts opened by the recruited individuals, without the knowledge or authorization of the Marine account holders.

9. It was further part of the scheme that defendants PARKER and EVANS withdrew and spent funds from the Navy Federal Credit Union accounts that PARKER and EVANS accessed and controlled, knowing that the money was derived from fraudulent transfers of funds from the Marines' accounts.

10. It was further part of the scheme that defendants PARKER and EVANS misrepresented, concealed, and hid, and caused to be misrepresented,

concealed, and hidden, certain material facts, including the acts and purposes of the acts done in furtherance of the scheme.

11. On or about April 17, 2014, at Calumet City, in the Northern District of Illinois, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the transfer of approximately \$3,000 from the Navy Federal Credit Union account belonging to Marine NK to the Navy Federal Credit Union account belonging to Marine ML;

In violation of Title 18, United States Code, Section 1344.

COUNT TWO

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1-10 of Count One are incorporated here.
2. On or about May 19, 2014, at Calumet City, in the Northern District of

Illinois, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, knowingly executed and attempted to execute the above-described scheme by causing the transfer of approximately \$100 from the Navy Federal Credit Union account belonging to Marine AT to the Navy Federal Credit Union account belonging to Individual WS;

In violation of Title 18, United States Code, Section 1344.

COUNT THREE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1-10 of Count One are incorporated here.
2. On or about June 10, 2014, at Lansing, in the Northern District of Illinois, and elsewhere,

LEONARD E. PARKER, JR. and
DONTREAL S. EVANS, also known as “Moose,”

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing the transfer of approximately \$4,000 from the Navy Federal Credit Union account belonging to Marine DR to the Navy Federal Credit Union account belonging to Individual MJ;

In violation of Title 18, United States Code, Section 1344.

COUNT FOUR

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1-10 of Count One are incorporated here.
2. On or about June 25, 2014, at Steger, in the Northern District of Illinois, and elsewhere,

LEONARD E. PARKER, JR. and
DONTREAL S. EVANS, also known as “Moose,”

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing the transfer of \$1,000 from the Navy Federal Credit Union account belonging to Marine JT to the Navy Federal Credit Union account belonging to Individual NJ;

In violation of Title 18, United States Code, Section 1344.

COUNT FIVE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

1. Paragraphs 1-10 of Count One are incorporated here.
2. On or about June 27, 2014, at Steger, in the Northern District of Illinois, and elsewhere,

LEONARD E. PARKER, JR. and
DONTREAL S. EVANS, also known as “Moose,”

defendants herein, knowingly executed and attempted to execute the above-described scheme by causing the transfer of \$2,000 from the Navy Federal Credit Union account belonging to Marine RN to the Navy Federal Credit Union account belonging to Individual ES;

In violation of Title 18, United States Code, Section 1344.

COUNT SIX

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about April 17, 2014, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, did knowingly possess and use, without lawful authority, a means of identification of another person, namely, the name of Marine NK, knowing that Marine NK was a real person, during and in relation to the offense conduct described in Count One of this indictment, knowing that the means of identification belonged to another person;

In violation of Title 18, United States Code, Section 1028A(a)(1).

COUNT SEVEN

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about January 31, 2014, at Markham, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, did make and present to the Internal Revenue Service, an agency of the United States Department of the Treasury, a claim upon and against the United States, namely, a tax year 2014 Income Tax Return, Form 1040EZ, wherein he claimed a refund for withholding taxes in the amount of \$903 for Marine AW, knowing such claim to be false, fictitious, and fraudulent;

In violation of Title 18, United States Code, Section 287.

COUNT EIGHT

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about January 31, 2014, at Markham, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, did make and present to the Internal Revenue Service, an agency of the United States Department of the Treasury, a claim upon and against the United States, namely, a tax year 2014 Income Tax Return, Form 1040EZ, wherein he claimed a refund for withholding taxes in the amount of \$841 for Marine MA, knowing such claim to be false, fictitious, and fraudulent;

In violation of Title 18, United States Code, Section 287.

COUNT NINE

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about January 20, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, did make and present to the Internal Revenue Service, an agency of the United States Department of the Treasury, a claim upon and against the United States, namely, a tax year 2014 Income Tax Return, Form 1040EZ, wherein he claimed a refund for withholding taxes in the amount of \$9,990 for himself, knowing such claim to be false, fictitious, and fraudulent;

In violation of Title 18, United States Code, Section 287.

COUNT TEN

The SPECIAL FEBRUARY 2014 GRAND JURY further charges:

On or about February 2, 2015, at Calumet City, in the Northern District of Illinois, Eastern Division, and elsewhere,

LEONARD E. PARKER, JR.,

defendant herein, did make and present to the Internal Revenue Service, an agency of the United States Department of the Treasury, a claim upon and against the United States, namely, a tax year 2014 Income Tax Return, Form 1040EZ, wherein he claimed a refund for withholding taxes in the amount of \$5,644 for Marine RV, knowing such claim to be false, fictitious, and fraudulent;

In violation of Title 18, United States Code, Section 287.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY