

IN THE DISTRICT COURT OF TULSA COUNTY

STATE OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

vs.

JORDAN B. PARKER,
W/M DOB: April 1985,
SSN: XXX-XX-9803,

Defendant.

CF-2024-2033

Case No. CF-2024-

DISTRICT COURT
FILED

JUN 05 2024

AFFIDAVIT OF PROBABLE CAUSE

I, Joshua Lacy, do attest that the following is true and factual to the best of my knowledge and belief, regarding the following information. This Affidavit does not include each and every fact known to the government, but only those facts necessary to support a finding of probable cause. I am currently employed as an Agent for the State of Oklahoma, Office of the Attorney General, assigned to investigate fraud complaints filed with the Consumer Protection Unit.

I was assigned to investigate CINV-22-0009, wherein several complaints were filed against the Defendant, Jordan B. Parker and Co-Defendant, Vanessa R. Parker. J. Parker identified himself as the Founder and Chief Executive Officer (CEO), of the charitable organization known as the Reckless Saints of Nowhere, Inc., (RSN). V. Parker is the wife of J. Parker and is identified as the secretary of RSN on the corporation's filings with the Secretary of State. V. Parker was also known to several of the board members as the secretary of RSN.

At its inception, RSN was registered as a for-profit corporation, but was subsequently amended to be a 501(c)(3) non-profit charitable organization. The Office of the Attorney General received several complaints from citizens who voiced their concerns regarding potentially misappropriated charitable RSN funds. During the course of this investigation, I conducted interviews, read reports, and reviewed various documents pertaining to the allegations against J. Parker. The following information was obtained during the investigation:

J. Parker and V. Parker operated RSN from 2017 through 2023. RSN was established with the purpose of consulting, drug counseling, and rehabilitation placement to assist individuals addicted to and recovering from substance abuse. RSN's primary source of revenue was solicitation of financial donations from various churches and religious organizations. J. Parker alleged RSN sold t-shirts and apparel for a profit. Throughout this investigation it appeared the sales of t-shirts were not profitable. RSN was operated primarily by J. Parker and V. Parker with

minimal oversight from its board of directors. J. Parker and V. Parker had access to and utilized RSN financial checks and/or debit card(s) to make purchases not related to RSN activities. The following financial accounts were utilized by J. Parker and are associated with the crimes committed:

Financial Institution	Date Opened	Acct. #	Signatories
First Bank of Chouteau	8/15/16	0174	The Reckless Saints of Nowhere, Vanessa Flickinger (Maiden name) & Jordan B. Parker
Arvest Bank	9/20/21	6362	Reckless Saints of Nowhere Flight School Clients (FBO): Maxie Carpenter, Ian VanCuren, & Jordan Parker; amended 10/26/21 to Jordan Parker, Ian VanCuren, & Graham Darby; amended 4/22/22 to Graham Darby, Jordan Parker, Gerald Patrick Tucker

The following personal joint checking account is also relevant to this matter:

Financial Institution	Opened	Acct. #	Signatories
RCB Bank	5/25/21	3748	Vanessa Parker & Jordan Parker

In the spring of 2021, J. Parker established a relationship with Paula Marshall, owner and operator of Bama Foods, Inc. (Bama). They came to an agreement wherein Bama would make a charitable contribution to assist in opening the RSN Flight School, located within the city of Salina, in Mayes County, OK. The program would be a work release program to assist participants with substance abuse addiction. On April 13, 2021, Marshall provided an initial donation of \$100,000.00 to RSN. The donation was believed to be utilized to launch the RSN Flight School program. The funds were transferred electronically to the RSN primary operating account, First Bank of Chouteau, account #0174. Review of the finances indicated J. Parker and V. Parker were utilizing the funds from the operating account #0174 to pay for personal financial debts, make large cash withdrawals, as well as make purchases from vendors which would not benefit the organization. On May 14th, 2021, within thirty (30) days of the \$100,000.00 donation, the balance in account #0174 was \$43.43. At that time, J. Parker began requesting additional funding from Bama. On June 8, 2021, Bama provided an additional donation of \$500,000.00, via wire to the RSN operating account #0174. The funds were provided for the purpose of "funding of the Cornerstone and Freedom Staffing Program." Cornerstone was how J. Parker described the model of the program's operation.

On April 13, 2021, J. Parker wrote a financial check (#1254) from the RSN charitable funds First Bank of Chouteau account #0174. The check was directed to Barry Chupp and signed using a mark consistent with that of J. Parker. The check was written in the amount of \$5,000.00. Through various interviews, your Affiant discovered the check was written to Chupp for the purchase of a 2004 Harley Davidson Motorcycle. The vehicle was stored at the residence of J.

Parker's father and registered under J. Parker's father's name, Tommy Parker. The vehicle purchase was unauthorized and not for the benefit of the organization.

On June 12, 2021, J. Parker and V. Parker purchased a 2019 Honda Pilot from CarMax Auto Superstores, Inc., 9131 S Memorial Dr., Tulsa, Tulsa County, OK. The vehicle was purchased for \$44,998.00. They provided cashier's check #83416, which was drawn from the RSN operating account #0174, and signed for by V. Parker, to CarMax for the amount of \$35,000.00. J. Parker and V. Parker then financed the remaining funds under their personal names. J. Parker and V. Parker provided handwritten financial checks to pay monthly payments for the financed portion of the vehicle. The handwritten checks were from both account #0174 and account #6362.

Agents spoke with current and former RSN board members who advised the transaction was unauthorized. Agents learned the Honda Pilot was the primary vehicle for V. Parker from a former RSN employee and was further informed the primary use of the vehicle was not for the benefit of RSN.

On July 1, 2021, J. Parker withdrew \$77,000.00 in the form of a cashier's check from the RSN operating account #0174. The finances were deposited into the RCB account #3748, which is J. Parker's and V. Parker's personal joint checking account. J. Parker then withdrew \$67,000.00 from their joint RCB Account #3748. J. Parker then sent \$30,000.00 to Dr. David Lamb, with Revival Tabernacle, Inc., a church in Kentucky. RSN employees were unsure what, if any, services were provided to RSN by Dr. Lamb. The \$30,000.00 was deposited by the church on August 26, 2021. J. Parker also transferred \$37,000.00 back into the RSN operating account #0174. The transactions left \$10,000.00 of charitable funds belonging to RSN unaccounted for, within J. Parker's personal RCB joint account #3748.

Between May 5, 2020, and August 30, 2022, J. Parker and V. Parker utilized approximately \$22,027.61 in RSN charitable funds, from First Bank of Chouteau account #0174, to purchase various items from Amazon.com. Approximately \$7,456.99 in charitable funds were utilized for transactions which were not approved or for the benefit of the organization. The items included but were not limited to Evel Knievel toys, Star Wars toys, Funko Pop! figurines, women's clothing items, children's clothing items, Pampers diapers, Fisher-Price toys, Prada men's sunglasses, a Rocky bath robe, and maternity clothing.

Between September 2020, and March 2022, J. Parker and V. Parker utilized approximately \$1,776.45 of RSN charitable funds for what was identified as Fight Camp. Agents conducted various interviews with individuals associated with RSN. A former employee and assistant to J. Parker, Patrick Tucker, advised the transactions were to fund what was described as an online fitness routine. The program came with a heavy boxing bag. Tucker advised the heavy bag was currently mounted and located within J. Parker's personal residence.

Between January 25th, 2020, and October 12th, 2021, J. Parker utilized approximately \$5,142.82 of RSN charitable funds from First Bank account #0174 to purchase various items on an online sport memorabilia auction known as Pristine Auction. J. Parker purchased items such as an unused Woodstock three day ticket, Notre Dame Fighting Irish used bench slab, Ric Flair signed wrestling boot, Abraham Lincoln handwritten note, various autographed jerseys, and

various Mystery Boxes with unknown items. Agents interviewed current and former RSN board members who advised they would not have approved such purchases with RSN charitable funds.

Between June 2020 and April 2021, J. Parker and V. Parker utilized approximately \$5,773.94 in RSN charitable funds from First Bank account #0174 to fund a Credit One Bank credit card. Agents reviewed documents obtained from the transactions. The transactions were for various items such as a clothing line known as Go Fast Don't Die, PoshMark, Boomtown Tees, Pristine Auction, Jane Motorcycles, Amazon, Aquariums, and Apple.com. Agents interviewed current and former RSN board members who advised they would not have approved the use of RSN charitable funds in that manner.

Between September 2020 and June 2021, J. Parker and V. Parker utilized approximately \$5,950 in RSN charitable funds as payment towards their personal home rent at 5881 W. 530 Rd, Pryor, Mayes County, OK. Agents spoke with current and former RSN board members who advised they would not have approved the RSN funds to be utilized in that manner. Several board members advised they specifically remembered advising J. Parker that he could not make personal purchases with the RSN funds.

Between June 15, 2020, and March 11, 2022, J. Parker and V. Parker utilized approximately \$19,487.78 in RSN charitable funds from First Bank account #0174 to finance a personal timeshare known as Bluegreen Vacations. The timeshare was only in J. Parker's and V. Parker's names. The transactions were unauthorized by the RSN board and not for the benefit of the organization.

Between May 24, 2020, and August 5, 2022, approximately \$15,168.41 in RSN charitable funds, from First Bank account #0174, were utilized by J. Parker and V. Parker for purchases from Walmart. Approximately \$3,966.13 in RSN charitable funds from the account would not have been approved by the RSN board, as advised by multiple current and former RSN board members. The purchased items included, but were not limited to, women's clothing, children's clothing items, Pampers diapers, Fisher-Price toys, and baby formula. The transactions were unauthorized and not for the benefit of the organization.

Between April 2021 and March 2023, J. Parker spent approximately \$30,081.63 from the RSN First Bank Account #0174, as well as Arvest account #6362, through Apple.com. Approximately \$25,819.02 appeared to be transactions which would not have been approved by the RSN board had they been presented to them. Of those unapproved transactions, approximately \$25,214.33 in RSN charitable funds were utilized to purchase various mobile video games. The transaction details indicate the transactions were to vendors such as Top Games Inc, King.com Limited, as well as Miniclip SA, which are all mobile game vendors. Your Affiant was informed by a RSN employee that the employee and J. Parker had various conversations about purchases through Apple. J. Parker was aware in early 2023, he could not utilize the funds in that manner and such expenditures were not acceptable. J. Parker advised he would repay the funds to RSN but has not done so at the time of this filing.

Further, J. Parker fraudulently appropriated funds from November 2021 through November

2022, belonging to Acie Carpenter and Evan Vandereems, participants in RSN's Flight School program. RSN arranged full-time employment for Flight School participants, whose wages were then paid directly to RSN. Part of the wages were retained by RSN to fund Flight School operations, and the remainder was deposited in Arvest Bank account #6362, 1818 S. Main St., Grove, Delaware County, OK, specifically designated as For Benefit of Client (FBO). Wages were held in the Arvest FBO account until the participants' completion of the Flight School program, at which point the remaining balance from the year's earned wages were to be provided to the participant. The funds were entrusted to J. Parker to administer and manage as a Financial Account Administrator of the FBO account at Arvest Bank. The funds were appropriated to J. Parker's own use and benefit at vendors such as Apple.com. At the time of graduation, Carpenter and Vandereems were told by J. Parker there were not enough funds within the FBO account for them to receive their accumulated wages.

As of November 3rd, 2021, the Bama donation into RSN account #0174 had been depleted by J. Parker and V. Parker. On November 3rd, the account balance was \$-78.34. On November 30th, RSN received \$30,000.00 from Bama in the form of a financial loan. On December 21st, the RSN account #0174 had been depleted to \$477.20. On January 7th, 2022, RSN received a second loan payment, from Bama, in the amount of \$15,000.00 deposited into the RSN account #0174. Both J. Parker and V. Parker depleted the funds by February 2nd. The account balance on that day indicated \$-54.44. J. Parker and V. Parker depleted those funds for their own personal use. J. Parker represented to Bama that approximately \$160,000.00 of the donated funds were utilized to purchase a property in Salina, OK, which did not occur. Instead, the Salina property was contracted as a lease-to-own, with RSN making monthly payments to the mortgage holder. He further informed Bama that funds were also to be utilized for vehicles, office space, housing, and to balance staffing needs of RSN. Approximately 8 months after RSN received \$600,000 in donations from Bama, the organization had little to no tangible assets to show for it

At this time J. Parker began to solicit funding in the form of donations from various religious and private institutions. From March 2022 until March 2023, there were approximately \$44,435.01 in unaccounted cash withdrawals from RSN accounts, which included financial checks written to be cashed from both accounts #0174 and #6362. This included checks written to themselves and specifically written for cash. Throughout the investigation, J. Parker and V. Parker had approximately \$6,980.00 in ATM withdrawals and \$2,533.00 in overdraft fees.

Your Affiant spoke with various individuals associated with RSN, including current and former RSN board members. J. Parker embezzled RSN charitable funds by making large amounts of purchases to vendors such as Amazon, Apple, Bluegreen Vacations, and Walmart. J. Parker purchased (2) separate vehicles, made payments to personal vehicle loans, as well as paid personal financial loans with charitable funds. Your Affiant spoke with current and former RSN board members who advised they were unaware of the purchases and would likely not have approved the spending due to their personal nature.

Between January 2020 and March 2023, J. Parker engaged in a pattern of criminal offenses

within Tulsa County, Mayes County, as well as Delaware County. J. Parker engaged in Embezzlement as part of the same plan, scheme, or venture within three (3) separate Counties within the State of Oklahoma.

Your Affiant believes probable cause exists to show J. Parker committed four (4) count(s) of Embezzlement in violation of 21 § 1451(B), as well as a Pattern of Criminal Offenses in violation of 21 § 425. The undersigned asks that this Court issue a finding of fact that there is probable cause to believe that the above-named DEFENDANT committed these crimes and issue a warrant for the arrest of JORDAN BLAKE PARKER be issued.

Further Affiant sayeth not.

Oklahoma Office of the Attorney General

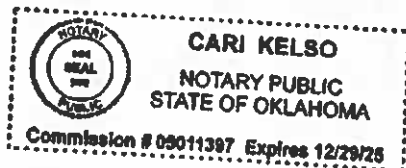
By: _____

Joshua Lacy
Joshua Lacy, Agent,
Consumer Protection Unit

SUBSCRIBED AND SWORN to before me this 5th day of June 2024.

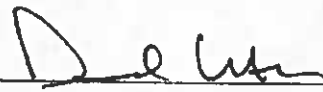
Cari Kelso
Notary Public

Commission Expires: 12-29-2025
Commission Number: 501397



FINDING OF PROBABLE CAUSE

On this 5 day of June, 2024, the above styled and numbered cause came on for hearing before me, the undersigned Judge of the District Court of Tulsa County, Oklahoma, upon the Affidavit of the above-named Officer with the Attorney General's Office requesting that a warrant of arrest be issued for **Jordan Blake Parker**, that he might be arrested and held to answer for the offenses of **Embezzlement x 4 and Pattern of Criminal Offenses**. Based upon said Affidavit I am satisfied and do hereby find that the offenses of **Embezzlement x 4 and Pattern of Criminal Offenses** have been committed, that there is probable cause to believe that **Jordan Blake Parker** has committed said offenses, and that a warrant of arrest should issue.



JUDGE OF THE DISTRICT COURT

Dated this 5 day of June, 2024.