

IN THE DISTRICT COURT OF TULSA COUNTY



STATE OF OKLAHOMA

STATE OF OKLAHOMA,

Plaintiff,

vs.

VANESSA R. PARKER,  
W/F DOB: November 1994,  
SSN: XXX-XX-4372,

Defendant,

**CF-2024-2033**

Case No. CF-2024-

**DISTRICT COURT  
FILED  
JUN 05 2024**

DON NEWBERRY, Court Clerk  
STATE OF OKLA. TULSA COUNTY

**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, Vanessa Rose Parker and Co-Defendant, Jordan Blake 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 and participants 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 V. 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. 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 V. 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. Marshall believed the donation was 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 14<sup>th</sup>, 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.

On June 12, 2021, V. Parker and J. 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. V. Parker and J. Parker then financed the remaining funds under their personal names. V. Parker provided handwritten 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.

Between May 5, 2020, and August 30, 2022, V. Parker and J. 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 and V. Parker's personal residence.

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, V. Parker and J. 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 V. Parker's and J. 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 V. Parker and J. 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.

As of November 3<sup>rd</sup>, 2021, the Bama donation into RSN account #0174 had been depleted by J. Parker and V. Parker. On November 3<sup>rd</sup>, the account balance was \$-78.34. On November 30<sup>th</sup>, RSN received \$30,000.00 from Bama in the form of a financial loan. On December 21<sup>st</sup>, the RSN account #0174 had been depleted to \$477.20. On January 7<sup>th</sup>, 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 2<sup>nd</sup>. The account balance on that day indicated \$-54.44. J. Parker and V. Parker depleted those funds for their own personal use. 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. V. Parker embezzled RSN charitable funds by making large amounts of purchases from vendors such as Amazon, Bluegreen Vacations, and Walmart. V. Parker purchased a vehicle, 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, V. Parker engaged in a pattern of criminal offenses within Tulsa County and Mayes County. The Defendant engaged in Embezzlement as part of the same plan, scheme, or venture within two (2) separate Counties within the State of Oklahoma.

Your Affiant believes probable cause exists to show the **DEFENDANT committed two (2) counts 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 **VANESSA ROSE PARKER.**

Further Affiant sayeth not.

Oklahoma Office of the Attorney General

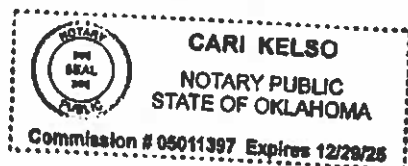
By: \_\_\_\_\_

*Joshua Lacy*  
Joshua Lacy, Agent,  
Consumer Protection Unit

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

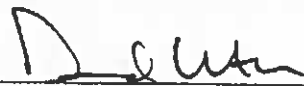
*Cari Kelso*  
Notary Public

Commission Expires: 12-29-2025  
Commission Number: 521397



## 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 **Vanessa Rose Parker**, that he might be arrested and held to answer for the offenses of **Embezzlement x 2 and Pattern of Criminal Offenses**. Based upon said Affidavit I am satisfied and do hereby find that the offenses of **Embezzlement x 2 and Pattern of Criminal Offenses** have been committed, that there is probable cause to believe that **Vanessa Rose 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.