

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :
 : SEALED INDICTMENT
- v. - :
 : 14 Cr.
NADEISHA BLAKE, :
RASHINA WATSON, :
CRYSTAL MOSS, :
KIMONA PETERKIN, :
MELISSA BLAKE, and :
SOPHIA BLAKE, :
 :
Defendants. :
 :
 :
-----X

COUNT ONE

(Conspiracy to Commit Wire Fraud)

The Grand Jury charges:

The Jamaican Lottery Scheme

1. From at least in or about 2010 through at least in or about March 2013, NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, participated in a telemarketing scheme to defraud elderly victims.

2. To effectuate the scheme, individuals in Jamaica (the "Jamaica-Based Co-Conspirators") purchased lists containing the names, contact information, and ages of elderly individuals.

The Jamaica-Based Co-Conspirators then telephoned these elderly individuals and told them they had won the lottery. They also told the elderly individuals that to receive their winnings they must provide the Jamaica-Based Co-Conspirators with money to cover various taxes and fees associated with the lottery winnings. In many instances, at least one of the Jamaica-Based Co-Conspirators also sent, or had at least one of the defendants send, documents to the elderly individuals that purported to be official lottery notifications.

3. Based on these representations, the elderly victims then sent cash or checks through the United States mail to the defendants. Upon receiving the payments from the elderly victims, the defendants used wire transfers, prepaid credit cards, and couriers to transmit the funds to Jamaica.

4. Dozens of elderly victims sent money as part of the scheme. None received any lottery winnings. In total, the defendants and their co-conspirators defrauded their elderly victims of more than \$400,000.00.

Relevant Individuals

5. At all times relevant to this Indictment, NADEISHA BLAKE, the defendant, has resided in the Southern District of New York. For years BLAKE has accepted payments in exchange for her assistance with the Jamaican lottery scheme,

including receiving money from victims and sending that money to the Jamaica-Based Co-Conspirators, among others.

6. At all times relevant to this Indictment, RASHINA WATSON, the defendant, has resided in Maryland. WATSON has participated in the Jamaican lottery scheme by accepting money from at least one elderly victim and helping transmit money to the Jamaica-Based Co-Conspirators, among others.

7. At all times relevant to this Indictment, CRYSTAL MOSS, the defendant, has resided in the Southern District of New York. MOSS has participated in the Jamaican lottery scheme by accepting money from elderly victims.

8. At all times relevant to this Indictment, KIMONA PETERKIN, the defendant, has resided in New York, New York or Jamaica, New York. PETERKIN participated in the Jamaican lottery scheme by accepting money from elderly victims and transmitting or transporting the money to the Jamaica-Based Co-Conspirators, among others.

9. At all times relevant to this Indictment, MELISSA BLAKE, the defendant, has resided in the Southern District of New York. BLAKE participated in the Jamaican lottery scheme both by accepting payments from victims and sending portions of those payments to the Jamaica-Based Co-Conspirators, among others.

10. At all times relevant to this Indictment, SOPHIA BLAKE, the defendant, has resided in the Southern District of New York. BLAKE participated in the Jamaican lottery scheme by accepting payments from victims and transporting or transmitting payments to the Jamaica-Based Co-Conspirators, among others.

11. At all times relevant to this Indictment, Co-Conspirator 1 ("CC-1"); Co-Conspirator 2 ("CC-2"); Co-Conspirator 3 ("CC-3"); and Co-Conspirator 4 ("CC-4") have lived in Jamaica. CC-1, CC-2, CC-3, and CC-4 all have participated in the Jamaican Lottery scheme. Among other things, CC-1 and CC-2 have placed calls to elderly victims throughout the United States, directed their victims to send money to their designees, and received their victims' money in Jamaica. CC-3 transported victims' funds from the United States to Jamaica. CC-4 received wire transfers of victims' money from the defendants.

Statutory Allegations

12. From at least in or about 2010, up to and including in or about March 2013, in the Southern District of New York and elsewhere, NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to violate Sections 1341 and 1343 of Title 18, United States Code.

13. It was a part and an object of the conspiracy that NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, for the purpose of executing such scheme and artifice and attempting so to do, would and did place in a post office and authorized depository for mail matter, matters and things to be sent and delivered by the Postal Service, and would and did deposit and cause to be deposited matters and things to be sent and delivered by private and commercial interstate carriers, and would and did take and receive therefrom such matters and things, and would and did knowingly cause to be delivered by mail and such carriers

according to the directions thereon, and at the places at which they were directed to be delivered by the persons to whom they were addressed, such matters and things, in violation of Title 18, United States Code, Section 1341.

14. It was further a part and an object of the conspiracy that NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, and others known and unknown, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

Overt Acts

15. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed by the defendants, in the Southern District of New York and elsewhere:

a. In or about November 2012, in the Bronx, New York, NADEISHA BLAKE, the defendant, deposited into her personal

bank account a \$7,500.00 check from an elderly victim ("Victim-1").

b. In or about February 2013, in Maryland, RASHINA WATSON, the defendant, received \$25,000.00 in cash via U.S. Mail from Victim-1. WATSON then gave a portion of the cash to CC-3 to take back with her to Jamaica.

c. In or about February 2011, in the Bronx, New York, CRYSTAL MOSS, the defendant, received \$2,500.00 from an elderly victim via a wire transfer ("Victim-2").

d. In or about September 2012, in the Bronx, New York, KIMONA PETERKIN, the defendant, received two checks via U.S. mail from an elderly victim ("Victim-3"). PETERKIN deposited the checks into her personal bank account. PETERKIN then transferred money to CC-1.

e. In or about May 2012, in the Bronx, New York, MELISSA BLAKE, the defendant, deposited a \$9,800.00 check from an elderly victim ("Victim-4") into her personal bank account.

f. In or about 2012, in the Bronx, New York, SOPHIA BLAKE, the defendant, loaded money from Green Dot prepaid cards onto debit cards, which she then sent to CC-1.

(Title 18, United States Code, Section 1349.)

COUNT TWO

The Grand Jury charges:

16. From at least in or about 2010 until at least in or about March 2013, NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises, for the purpose of executing such scheme and artifice and attempting so to do, willfully and knowingly did place in a post office and authorized depository for mail matter, a matter and thing to be sent and delivered by the Postal Service, and would and did take and receive there from, such matter and thing, and did cause to be delivered by mail according to the direction thereon, and at the place at which it is directed to be delivered by the person to whom it is addressed, a matter and thing, in violation of Title 18, United States Code, Section 1341, to wit, BLAKE, WATSON, MOSS, PETERKIN, BLAKE, and BLAKE received cash and checks from elderly victims through the U.S. mails that the victims sent based on misrepresentations that the victims had won a lottery.

(Title 18, United States Code, Sections 1341 and 2.)

COUNT THREE

The Grand Jury charges:

17. From at least in or about 2010 until at least in or about March 2013, NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, having devised an intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, willfully and knowingly did transmit and cause to be transmitted by means of wire and radio communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, BLAKE, WATSON, MOSS, PETERKIN, BLAKE, and BLAKE transferred or received fraudulently-obtained funds via money transfer services such as MoneyGram.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATION

18. As a result of committing the offenses in Counts One, Two and Three of this Indictment, NADEISHA BLAKE, RASHINA WATSON, CRYSTAL MOSS, KIMONA PETERKIN, MELISSA BLAKE, and SOPHIA BLAKE, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real or personal, constituting or derived from any proceeds traceable to the commission of the offense alleged in Count One of this Indictment, including but not limited to a sum of United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

19. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;

d. has been substantially diminished in value;

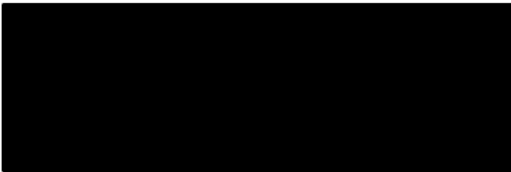
or

e. has been commingled with other property

which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853 (p), and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Section 981(a)(1)(C), Title 21, United States Code, Section 853(p), Title 28, United States Code, Section 2461(c).)



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PREET BHARARA
United States Attorney

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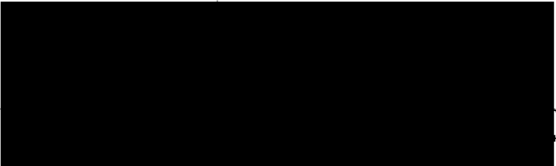
Defendants.

SEALED INDICTMENT

14 Cr. _____

(18 U.S.C. §§ 1341, 1343, 1349, and 2)

PREET BHARARA
United States Attorney.

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