

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

: Hon.

09-678 (PG5)

v.

: Criminal No. 09-

ANTYWAN ROSS

: 18 U.S.C. §§ 1343 and 2

INDICTMENT

The Grand Jury in and for the District of New Jersey,
sitting in Newark, charges:

COUNTS 1 THROUGH 5

(Wire Fraud)

1. From at least as early as in or about August 2008
through in or about January 2009, in Bergen County, in the
District of New Jersey, and elsewhere, defendant

ANTYWAN ROSS

did knowingly devise and intend to devise a scheme and artifice
to defraud, and to obtain money and property by means of
materially false and fraudulent pretenses, representations, and
promises which scheme and artifice in substance is set forth
below.

Object of the Scheme to Defraud

2. It was the object of the scheme and artifice to
defraud for defendant ANTWYAN ROSS to fraudulently obtain money
from an investor by having the investor provide initial expense
money for the promotion of a number of concerts featuring a major

international singer and instead using the money primarily for defendant ANTWYAN ROSS' personal use and benefit.

The Means and Methods of the Scheme to Defraud

3. It was part of the scheme and artifice to defraud that the defendant ANTWYAN ROSS, through his company the RDA Group ("RDA"), claimed to be promoting a series of concerts in or about the Winter of 2008 in Dubai, United Arab Emirates, featuring a major international singer (the "Concerts").

4. It was further part of the scheme and artifice to defraud that the defendant ANTWYAN ROSS solicited an investor (the "Investor") to pay for certain startup expenses associated with the Concerts (the "Investment"), which Investment defendant ANTWYAN ROSS claimed would be repaid with interest within 45 days of initial investment.

5. It was further part of the scheme and artifice to defraud that in order to provide the appearance of protecting the Investor, defendant ANTWYAN ROSS engaged the services of an escrow agent (the "Escrow Agent") who was responsible for maintaining the Investment and not disbursing the Investment until, among other things, defendant ANTWYAN ROSS provided proof that at least \$1 million had been committed to the Concerts by other sponsors.

6. It was further part of the scheme and artifice to defraud that the defendant ANTWYAN ROSS caused a false and

fraudulent letter, written on what purported to be the stationary of a law firm, confirming that more than \$10 million in sponsorship money had been committed to the Concerts (the "Sponsorship Letter") to be delivered to the Escrow Agent.

7. It was further part of the scheme and artifice to defraud that once the Sponsorship Letter had been delivered to the Escrow Agent, defendant ANTWYAN ROSS caused the Escrow Agent to release the Investment at his direction for expenses he claimed were in furtherance of staging the Concerts. Rather than paying purported expenses, defendant ANTWYAN ROSS used the majority of the Investment for his personal benefit such as the purchase of an automobile.

8. It was further part of the scheme and artifice to defraud that once the Concerts did not take place, defendant ANTWYAN ROSS never repaid the Investment or any interest as promised.

9. On or about the dates listed below, for the purpose of executing and attempting to execute this scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, defendant

ANTWYAN ROSS,

knowingly transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce, certain

writings, signs, signals, pictures, and sounds as set forth below, each constituting a separate count of this Indictment:

Count	Approximate Date	Description
1	October 6, 2008	Wire transfer of approximately \$330,000 from Investor's bank account in Maywood, New Jersey, to Escrow Agent's bank account in New York, New York.
2	October 7, 2008	Email from defendant ANTWYAN ROSS in California to New York which attached the fraudulent Sponsorship Letter.
3	October 9, 2008	Email from defendant ANTWYAN ROSS in Georgia to New York asking the Escrow Agent to begin disbursing the Investment.
4	October 14, 2008	Email from defendant ANTWYAN ROSS in California to New York directing the Escrow Agent to disburse a portion of the Investment to RDA.
5	October 14, 2008	Wire transfer of approximately \$52,000 from the Escrow Agent's bank account in New York to RDA's bank account in Georgia.

All in violation of Title 18, United States Code, Section 1343 and Section 2.

A TRUE BILL

FOREPERSON

Ralph J. Marra, Jr.
RALPH J. MARRA, JR.
Acting United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

ANTYWAN ROSS

INDICTMENT FOR

18 U.S.C. §§ 1343 & 2

A True Bill,

Foreperson

RALPH J. MARRA, JR.
*ACTING UNITED STATES ATTORNEY
NEWARK, NEW JERSEY*

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*ASSISTANT U.S. ATTORNEY
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