

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL No. 12-_____
v. : DATE FILED: March 22, 2012
CARTER ERIC JACKSON, : VIOLATIONS:
a/k/a "X. Dot," : 18 U.S.C. § 371 (conspiracy to possess
a/k/a "S. Dot," : and pass counterfeit currency – 1 count)
MATTHEW ZAYZAY, JR., : 18 U.S.C. § 472 (possessing or passing
JEREMIAH JOHNSON, : counterfeit United States currency – 26
a/k/a "Jeremy Young," : counts)
DIAMOND GIBSON KEYKPO, : 18 U.S.C. § 473 (dealing counterfeit
a/k/a "Dommie Gibson," : United States currency – 4 counts)
FIDEL GRIMES, : 18 U.S.C. § 922(g)(1) (possession of a
a/k/a "Elkann Feilder," : firearm by a convicted felon – 1 count)
WINSTON IRVING, : 18 U.S.C. § 2 (aiding and abetting)
MONTGOMERY TAMBA SAAH, JR. : Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. From at least July 2011 to on or about February 24, 2012, in the Eastern District of Pennsylvania, in the District of New Jersey, and elsewhere, defendants

CARTER ERIC JACKSON,
a/k/a "X. Dot,"
a/k/a "S. Dot,"
MATTHEW ZAYZAY, JR.,
JEREMIAH JOHNSON,
a/k/a "Jeremy Young,"
DIAMOND GIBSON KEYKPO,
a/k/a "Dommie Gibson,"
FIDEL GRIMES,
a/k/a "Elkann Feilder,"
WINSTON IRVING,
MONTGOMERY TAMBA SAAH, JR.

conspired and agreed, together and with others known and unknown to the grand jury, to commit offenses against the United States, that is, to knowingly and unlawfully and with intent to defraud, possess and pass, sell, and transfer counterfeit United States currency, in violation of Title 18, United States Code, Section 472 and 473.

MANNER AND MEANS

2. It was part of the conspiracy that defendant CARTER ERIC JACKSON, together and with others known and unknown to the grand jury, turned genuine \$5 bills into counterfeit currency of higher denomination by bleaching the ink from the \$5 bills, drying them, and printing the design of a higher-denomination bill on the paper. In making counterfeit currency, defendant JACKSON preferred to use “old style \$5 bills” over newer bills. Because the “old style \$5 bills” contained a watermark portrait of the face of President Abraham Lincoln, while the redesigned \$5 bill contained a large numeral “5” watermark, counterfeit bills printed on the newer \$5 bills were more likely to be rejected by retail store clerks inspecting the money.

3. Defendant CARTER ERIC JACKSON sold the counterfeit bills – typically counterfeit \$50 bills – for cash to customers known and unknown to the grand jury, including defendants MATTHEW ZAYZAY, JR. and DIAMOND GIBSON KEYKPO, who in turn distributed the counterfeit bills to persons known and unknown to the grand jury, including defendants JEREMIAH JOHNSON, FIDEL GRIMES, WINSTON IRVING, and MONTGOMERY TAMBA SAAH, JR.

4. Over the course of the conspiracy, defendant CARTER ERIC JACKSON, and others known and unknown to the grand jury, possessed, passed or attempted to pass, at least \$149,310.

5. During the conspiracy, defendants CARTER ERIC JACKSON, MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, DIAMOND GIBSON KEYKPO, FIDEL GRIMES, WINSTON IRVING, and MONTGOMERY TAMBA SAAH, JR. passed counterfeit bills at retail stores. At these stores they bought merchandise with counterfeit bills, obtained change in real United States currency, and/or returned merchandise previously bought with counterfeit currency to obtain more genuine United States currency.

6. To help defendant CARTER ERIC JACKSON make more counterfeit currency, defendants MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES, MONTGOMERY TAMBA SAAH, JR., and others known and unknown to the grand jury, helped supply defendant JACKSON with “old style \$5 bills” by asking for them in area stores and providing them to defendant JACKSON.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its objects, defendants CARTER ERIC JACKSON, MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, DIAMOND GIBSON KEYKPO, FIDEL GRIMES, WINSTON IRVING, and MONTGOMERY TAMBA SAAH, JR. committed the following overt acts, among others, in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere:

On or about the following dates, in the following locations in the Eastern District of Pennsylvania, the District of New Jersey, and elsewhere, the following defendants, and others known and unknown to the grand jury, possessed and passed, or attempted to possess and pass, counterfeit currency at retail stores, including counterfeit \$50 Federal Reserve Notes in locations and approximate amounts, each instance constituting a separate overt act, as follows:

Overt Act	Date	Location	Defendant(s)	Amount of counterfeit Federal Reserve Notes
1	3/8/11	Glenolden, PA	CARTER ERIC JACKSON	\$1,210
2	9/7/11	Mantua, NJ	DIAMOND GIBSON KEYKPO, WINSTON IRVING	\$500
3	9/23/11	Evesham, NJ	DIAMOND GIBSON KEYKPO, unidentified person	\$550
4	9/24/11	Sicklerville, NJ	MONTGOMERY TAMBA SAAH, JR., unidentified person	\$750
5	9/27/11	Vorhees, NJ	DIAMOND GIBSON KEYKPO, WINSTON IRVING	\$800
6	9/29/11	Boothwyn, PA	DIAMOND GIBSON KEYKPO, WINSTON IRVING	\$800
7	10/16/11	Doylestown, PA	DIAMOND GIBSON KEYKPO, unidentified person	\$250
8	10/24/11	Millville, NJ	JEREMIAH JOHNSON	\$550
9	11/8/11	Reading, PA	DIAMOND GIBSON KEYKPO, unidentified person	\$250
10	11/12/11	Norristown, PA	JEREMIAH JOHNSON	\$250
11	11/12/11	Norristown, PA	DIAMOND GIBSON KEYKPO	\$250
12	11/15/11	Hatfield, PA	DIAMOND GIBSON KEYKPO, JEREMIAH JOHNSON, WINSTON IRVING	\$350
13	12/24/11	Cheltenham, PA	FIDEL GRIMES, JEREMIAH JOHNSON	\$700
14	12/27/11	Cheltenham, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$900
15	12/30/11	Abington, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$1,400
16	12/30/11	Cheltenham, PA	MATTHEW ZAYZAY, JR.	\$400
17	1/2/12	Abington, PA	MATTHEW ZAYZAY, JR.	\$700 (attempt)
18	1/3/12	Springfield, PA	DIAMOND GIBSON KEYKPO	\$350 (attempt)
19	1/10/12	Philadelphia, PA	DIAMOND GIBSON KEYKPO	\$250
20	1/13/12	Cherry Hill, NJ	JEREMIAH JOHNSON	\$300 (attempt)
21	1/13/12	Cherry Hill, NJ	MATTHEW ZAYZAY, JR.	\$650
22	1/13/12	Cherry Hill, NJ	MATTHEW ZAYZAY, JR.	\$550
23	1/21/12	Plymouth Meeting, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$2,050
24	1/22/12	Concord, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$350
25	1/24/12	Neshaminy, PA	MATTHEW ZAYZAY, JR.	\$500
26	1/24/12	Philadelphia, PA	MATTHEW ZAYZAY, JR.	\$750

27	1/24/12	Oxford Valley, PA	MATTHEW ZAYZAY, JR.	\$650
28	1/26/12	Concordville, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	(attempt)
29	1/26/12	Exton, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$700
30	1/27/12	Oxford Valley, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	(attempt)
31	1/28/12	Oaks, PA	MATTHEW ZAYZAY, JR.	\$500
32	1/28/12	Upper Providence, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$1,450
33	1/31/12	Pottsgrove, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$850
34	2/1/12	Temple, PA	JEREMIAH JOHNSON, FIDEL GRIMES	\$750
35	2/4/12	Montgomeryville, PA	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$1,700
36	2/24/12	Upper Darby, PA	CARTER ERIC JACKSON	\$100

37. On November 15, 2011, defendants DIAMOND GIBSON KEYKPO, JEREMIAH JOHNSON, and WINSTON IRVING, having bought merchandise from various area stores and having returned some for cash, additionally possessed a counterfeit \$50 bill. Upon being approached by law enforcement agents, defendant KEYKPO attempted to throw away the \$50 bill.

38. On or about February 2, 2012, defendants DIAMOND GIBSON KEYKPO and FIDEL GRIMES entered into a retail store in Springfield, Pennsylvania to return merchandise previously bought. Defendant GRIMES asked to receive change in "old style \$5" bills.

39. On or about February 6, 2012 defendants MATTHEW ZAYZAY, JR. and MONTGOMERY TAMBA SAAH, JR. walked to area businesses to obtain "old style \$5 bills." Defendants ZAYZAY and SAAH then returned to defendant JEREMIAH JOHNSON's house and left. Two days later, on or about February 8, 2012, defendant CARTER ERIC JACKSON

then arrived at defendant JEREMIAH JOHNSON's house, and defendants JACKSON and JOHNSON and left together.

All in violation of Title 18, United States Code, Section 371.

COUNTS TWO THROUGH FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the following dates, in the Eastern District of Pennsylvania,
defendant

**CARTER ERIC JACKSON,
a/k/a "X. Dot,"
a/k/a "S. Dot,"**

knowingly sold, transferred, and delivered, and aided and abetted the sale, transfer, and delivery of, counterfeit obligations of the United States with the intent that the counterfeit Federal Reserve Notes be passed, published, and used as true and genuine.

Count	Date	Amount of counterfeit Federal Reserve Notes sold
2	7/20/11	\$600
3	10/28/11	\$3,000
4	12/12/11	\$3,000
5	2/22/12	\$1,900

In violation of Title 18, United States Code, Section 473 and 2.

COUNTS SIX THROUGH THIRTY-ONE

THE GRAND JURY FURTHER CHARGES THAT:

On or about the following dates, in the following locations in the Eastern District of Pennsylvania and elsewhere, the following defendants, with intent to defraud, possessed and concealed, passed and uttered, attempted to pass and utter, and aided and abetted the possession, concealment, passing, and uttering of, falsely made, forged, counterfeited, and altered obligations or other security of the United States, that is, the following amounts in counterfeit Federal Reserve Notes, each instance constituting a separate count:

Count	Date	Location	Defendant(s)	Amount of counterfeit Federal Reserve Notes
6	3/8/11	Glenolden	CARTER ERIC JACKSON	\$1,210
7	9/29/11	Boothwyn	DIAMOND GIBSON KEYKPO, WINSTON IRVING	\$800
8	10/16/11	Doylestown	DIAMOND GIBSON KEYKPO, unidentified person	\$250
9	11/8/11	Reading	DIAMOND GIBSON KEYKPO, unidentified person	\$250
10	11/12/11	Norristown	JEREMIAH JOHNSON	\$250
11	11/12/11	Norristown	DIAMOND GIBSON KEYKPO	\$250
12	11/15/11	Hatfield	DIAMOND GIBSON KEYKPO, JEREMIAH JOHNSON, WINSTON IRVING	\$350
13	12/24/11	Cheltenham	FIDEL GRIMES, JEREMIAH JOHNSON	\$700
14	12/27/11	Cheltenham	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$900
15	12/30/11	Abington	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$1,400
16	12/30/11	Cheltenham	MATTHEW ZAYZAY, JR.	\$400
17	1/2/12	Abington	MATTHEW ZAYZAY, JR.	\$700 (attempt)
18	1/3/12	Springfield	DIAMOND GIBSON KEYKPO	\$350 (attempt)
19	1/10/12	Philadelphia	DIAMOND GIBSON KEYKPO	\$250
20	1/21/12	Plymouth Meeting	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$2,050
21	1/24/12	Neshaminy	MATTHEW ZAYZAY, JR.	\$500

22	1/24/12	Philadelphia	MATTHEW ZAYZAY, JR.	\$750
23	1/24/12	Oxford Valley	MATTHEW ZAYZAY, JR.	\$650
24	1/26/12	Concordville	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	(attempt)
25	1/26/12	Exton	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$700
26	1/27/12	Oxford Valley	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	(attempt)
27	1/28/12	Oaks	MATTHEW ZAYZAY, JR.	\$500
28	1/28/12	Upper Providence	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON, FIDEL GRIMES	\$1,450
29	2/1/12	Temple	JEREMIAH JOHNSON, FIDEL GRIMES	\$750
30	2/4/12	Montgomeryville	MATTHEW ZAYZAY, JR., JEREMIAH JOHNSON	\$1,700
31	2/24/12	Upper Darby	CARTER ERIC JACKSON	\$100

In violation of Title 18, United States Code, Sections 472 and 2.

COUNT THIRTY-TWO

On or about February 24, 2012, in Upper Darby, in the Eastern District of Pennsylvania, defendant

**CARTER ERIC JACKSON,
a/k/a "X. Dot,"
a/k/a "S. Dot,"**

having been convicted in the Bucks County Court of Common Pleas of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate and foreign commerce a firearm, that is, a Smith & Wesson .38 caliber Special handgun with serial number J385282.

In violation of Title 18, United States Code, Section 922(g)(1).

NOTICE OF FORFEITURE #1

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 472 and 473, set forth in this indictment, defendants

**CARTER ERIC JACKSON,
a/k/a "X. Dot,"
a/k/a "S. Dot"
MATTHEW ZAYZAY, JR.,
JEREMIAH JOHNSON,
a/k/a "Jeremy Young,"
DIAMOND GIBSON KEYKPO,
a/k/a "Dommie Gibson,"
FIDEL GRIMES,
a/k/a "Elkann Feilder"
WINSTON IRVING,
MONTGOMERY TAMBA SAAH, JR.**

shall forfeit to the United States of America any and all property that constitutes or is derived, directly or indirectly, from proceeds traceable to the commission of the offenses, any property involved in such offenses, and any property traceable to such property.

2. If any of the property 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 party;
- (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 divided

without difficulty; it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 492 and 982(a)(2)(B), and
Title 28, United States Code, Section 2461.

NOTICE OF FORFEITURE #2

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violation of Title 18, United States Code, Section 922(g)(1), set forth in this indictment, defendant

**CARTER ERIC JACKSON,
a/k/a "X. Dot,"
a/k/a "S. Dot,"**

shall forfeit to the United States of America the firearm and ammunition involved in the commission of this offense, including, but not limited to, Smith & Wesson .38 caliber Special handgun with serial number J385282.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

A TRUE BILL:

FOREPERSON


ZANE DAVID MEMEGER
United States Attorney