

OCT 24 2019

ANGELA E. NOBLE
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S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO: **19-60313** - Altman, HUNT,

18 U.S.C. § 1349

18 U.S.C. § 1028A(a)(1)

18 U.S.C. § 2

18 U.S.C. § 981(a)(1)(C)

UNITED STATES OF AMERICA

v.

ROCKCLIF BURCHELL,

a/k/a "Liftaz,"

a/k/a "Fada Burch,"

JAMARE MASON,

a/k/a "Star Maxx,"

RONALDO GARFIELD GREEN,

MARIO ANDRE RICKETTS,

MAYOTT JOSEPH,

a/k/a "Trial Joseph,"

KADEEM GORDON,

a/k/a "So Dope Gordon,"

and

OMAR SHAQUILLE BAILEY,

Defendants.

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. Defendant **ROCKCLIF BURCHELL**, a/k/a "Liftaz," a/k/a "Fada Burch," was a resident of Montego Bay, Jamaica, West Indies.
2. Defendant **JAMARE MASON**, a/k/a "Star Maxx," was a resident of Snellville, Georgia.

3. Defendant **RONALDO GARFIELD GREEN** was a resident of Snellville, Georgia.

4. Defendant **MARIO ANDRE RICKETTS** was a resident of Carrollton, Georgia.

5. Defendant **MAYOTT JOSEPH, a/k/a "Trial Joseph,"** was a resident of Norcross, Georgia.

6. Defendant **KADEEM GORDON, a/k/a "So Dope Gordon,"** was a resident of Loganville, Georgia.

7. Defendant **OMAR SHAQUILLE BAILEY** was a resident of Snellville, Georgia.

8. Mikhail Bennett was a resident of Lauderdale Lakes, Florida.

9. The Department of Veterans Affairs ("VA") issued veteran disability benefits to United States Armed Forces veterans and/or their beneficiaries ("VA beneficiaries"). The VA direct deposited the veteran's benefits on a monthly basis into bank accounts provided by VA beneficiaries. VA beneficiaries were able to change their bank accounts through the VA's telephone system, the VA's e-benefits system on-line, or a direct deposit form sent to the VA via facsimile. In order to access their accounts VA beneficiaries had to provide personal identifying information, such as name, date of birth, and/or social security number.

10. The Social Security Administration ("SSA") issued social security retirement benefits to social security recipients and/or their beneficiaries ("SSA beneficiaries"). The SSA direct deposited the social security benefits into bank accounts provided by the SSA beneficiaries. SSA beneficiaries were able to change their bank accounts through the SSA's telephone system, the SSA's system on-line, or a request to their financial institution. In order

to access their accounts SSA beneficiaries had to provide personal identifying information, such as name, date of birth, and/or social security number.

11. Bank of America was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation.

COUNT 1
CONSPIRACY TO COMMIT WIRE AND BANK FRAUD
(18 U.S.C. § 1349)

1. The General Allegations Section of this Indictment is realleged and incorporated by reference as though fully set forth herein.

2. From in or around May 2012 through in or around July 2017, in Broward County, in the Southern District of Florida, and elsewhere, the defendants,

ROCKCLIF BURCHELL,
a/k/a "Liftaz,"
a/k/a "Fada Burch,"
JAMARE MASON,
a/k/a "Star Maxx,"
ROLANDO GARFIELD GREEN,
MARIO ANDRE RICKETTS,
MAYOTT JOSEPH,
a/k/a "Trial Joseph,"
KADEEM GORDON,
a/k/a "So Dope Gordon,"
and
OMAR SHAQUILLE BAILEY,

did willfully, that is with the intent to further the objects of the conspiracy, and knowingly combine, conspire, confederate, and agree with each other and with other persons known and unknown to the Grand Jury, to commit offenses against the United States, that is:

(a) to knowingly and with intent to defraud, 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, knowing that such pretenses,

representations, and promises were false and fraudulent when made, and, for the purpose of executing and attempting to execute the scheme and artifice, to knowingly transmit and cause to be transmitted, by means of wire communication, in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, in violation of Title 18, United States Code, Section 1343; and

(b) to knowingly and with the intent to defraud, devise, and intend to devise a scheme and artifice to defraud a financial institution, that is, Bank of America, which scheme and artifice would employ a material falsehood, and to knowingly, and with intent to defraud, execute, and cause the execution of, a scheme and artifice to obtain money, funds, credits, assets and other properties owned by, and under the custody or control of, a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, relating to a material fact, in violation of Title 18, United States Code, Section 1344(1) and (2).

PURPOSE OF THE CONSPIRACY

3. It was the purpose of the conspiracy for the defendants and their co-conspirators to unjustly enrich themselves by: (a) using stolen personal identifying information of VA beneficiaries and SSA beneficiaries to reroute VA and SSA benefits to accounts the defendants and their co-conspirators controlled; (b) withdrawing the funds from those accounts through various means; and (c) thereafter keeping those funds for their personal use and benefit.

MANNER AND MEANS OF THE CONSPIRACY

The manner and means by which the defendants and their co-conspirators sought to accomplish the objects and purpose of the conspiracy included, among others, the following.

4. **ROCKCLIF BURCHELL** obtained the personal identifying information of VA

and SSA beneficiaries, including among other information, their names, social security numbers, dates of birth, and military service.

5. Once in possession of the personal identifying information, **ROCKCLIF BURCHELL** contacted the VA and SSA through the telephone, internet, and facsimile and used the personal identifying information to access the benefits accounts of VA and SSA beneficiaries.

6. After accessing the benefits information, **ROCKCLIF BURCHELL** changed the direct deposit information relating to where the benefits should be deposited, and provided the VA and SSA with routing numbers and account numbers of accounts that the defendant and his co-conspirators controlled, including Bank of America accounts and prepaid debit cards.

7. **ROCKCLIF BURCHELL, JAMARE MASON, MARIO ANDRE RICKETTS, RONALDO GARFIELD GREEN, OMAR SHAQUILLE BAILEY, MAYOTT JOSEPH** and a co-conspirator caused the prepaid debit cards and ATM cards to be delivered to coconspirators in Broward County, Florida, Gwinnett and Carroll Counties, Georgia, among others.

8. **JAMARE MASON, MARIO ANDRE RICKETTS, RONALDO GARFIELD GREEN**, and a co-conspirator recruited **OMAR SHAQUILLE BAILEY, MAYOTT JOSEPH** and others to receive ATM cards and pre-paid debit cards at their addresses and at the addresses of others in Broward County, Florida, and Gwinnett and Carroll Counties, Georgia, among others.

9. **OMAR SHAQUILLE BAILEY, MAYOTT JOSEPH**, a coconspirator and others received ATM cards and pre-paid debit cards at their addresses and at the addresses of others in Broward County, Florida, and Gwinnett and Carroll Counties, Georgia, among others.

10. **JAMARE MASON, MARIO ANDRE RICKETTS, MAYOTT JOSEPH, a/k/a "Trial Joseph,"** used the ATM cards and pre-paid debit cards to withdraw funds at banks and ATM machines, and to conduct point of sale transactions.

11. **JAMARE MASON, RONALDO GARFIELD GREEN, MARIO ANDRE RICKETTS, MAYOTT JOSEPH, KADEEM GORDON and OMAR SHAQUILLE BAILEY** sent the funds to **ROCKCLIF BURCHELL** and other co-conspirators in Jamaica, West Indies.

All in violation of Title 18, United States Code, Section 1349.

COUNT 2
Aggravated Identity Theft
(18 U.S.C. § 1028A(a)(1))

On or about April 1, 2015, in Broward County, in the Southern District of Florida, and elsewhere,

ROCKCLIF BURCHELL,
a/k/a "Liftaz,"
a/k/a "Fada Burch,"

during and in relation to a felony violation of Title 18, United States Code, Section 1349, as alleged in Count 1, did knowingly transfer, possess, and use, without lawful authority, a means of identification of another person, that is, the name of an individual with the initials D.M.

In violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

FORFEITURE
(18 U.S.C. § 981(a)(1)(C))

1. The allegations contained in this Indictment are realleged and incorporated by reference as though fully set forth herein for the purpose of alleging forfeiture to the United States of certain property in which one or more of the defendants, **ROCKCLIF BURCHELL,**

JAMARE MAYSON, RONALDO GARFIELD GREEN, MARIO ANDRE RICKETTS, MAYOTT JOSEPH, KADEEM GORDON, and OMAR SHAQUILLE BAILEY has an interest.

2. Upon conviction of a violation of Title 18, United States Code, Section 1349, as alleged in this Indictment, the defendants, **ROCKCLIF BURCHELL, JAMARE MAYSON, RONALDO GARFIELD GREEN, MARIO ANDRE RICKETTS, MAYOTT JOSEPH, KADEEM GORDON, and OMAR SAHQUILLE BAILEY** shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation.

3. The property which is subject to forfeiture includes, but is not limited to, the following: a sum of money equal in value to the property, real or personal, which constitutes or is derived from proceeds traceable to the violations alleged in this Indictment, which the United States will seek as a forfeiture money judgment as part of a defendant's sentence.

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), as made applicable by Title 28, United States Code, Section 2461(c), and the procedure set forth at Title 21, United States Code, Section 853.

A TRUE BILL



ARIANA FAJARDO ORSHAN
UNITED STATES ATTORNEY



LOIS FOSTER-STEERS
ASSISTANT UNITED STATES ATTORNEY

FOREPERSON

V

UNITED STATES OF AMERICA

CASE NO. _____

v.

ROCKCLIF BURCHELL, et al.,

CERTIFICATE OF TRIAL ATTORNEY*

Superseding Case Information:

Defendants. _____

Court Division: (Select One)

☒ Miami ☐ Key West
☒ FTL ☐ WPB ☐ FTP

New defendant(s) Yes ☐ No ☐
Number of new defendants _____
Total number of counts _____

1. I have carefully considered the allegations of the indictment, the number of defendants, the number of probable witnesses and the legal complexities of the Indictment/Information attached hereto.
2. I am aware that the information supplied on this statement will be relied upon by the Judges of this Court in setting their calendars and scheduling criminal trials under the mandate of the Speedy Trial Act, Title 28 U.S.C. Section 3161.
3. Interpreter: (Yes or No) No
List language and/or dialect _____
4. This case will take 10 days for the parties to try.
5. Please check appropriate category and type of offense listed below:

(Check only one)

- I 0 to 5 days _____
II 6 to 10 days ☒
III 11 to 20 days _____
IV 21 to 60 days _____
V 61 days and over _____

(Check only one)

- Petty _____
Minor _____
Misdem. _____
Felony ☒

6. Has this case previously been filed in this District Court? (Yes or No) No
If yes: Judge Case No. _____

(Attach copy of dispositive order)

Has a complaint been filed in this matter? (Yes or No) No

If yes: Magistrate Case No. _____

Related miscellaneous numbers: _____

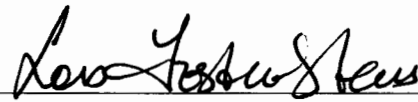
Defendant(s) in federal custody as of _____

Defendant(s) in state custody as of _____

Rule 20 from the District of _____

Is this a potential death penalty case? (Yes or No) No

7. Does this case originate from a matter pending in the Central Region of the U.S. Attorney's Office prior to August 9, 2013 (Mag. Judge Alicia O. Valle)? Yes ☐ No ☒
8. Does this case originate from a matter pending in the Northern Region U.S. Attorney's Office prior to August 8, 2014 (Mag. Judge Shanick Maynard)? Yes ☐ No ☒


LOIS FOSTER-STEERS
ASSISTANT UNITED STATES ATTORNEY
Florida Bar No. 480509

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

PENALTY SHEET

Defendant's Name: ROCKCLIF BURCHELL, a/k/a "Liftaz," a/k/a "Fada Burch"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

Count #: 2

Aggravated Identity Theft

Title 18, United States Code, Section 1028A

*** Max. Penalty:** Two (2) years' consecutive imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: JAMARE MASON, a/k/a "Star Maxx"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: RONALDO GARFIELD GREEN

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: MARIO ANDRE RICKETTS

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: MAYOTT JOSEPH, a/k/a "Trial Joseph"

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: KADEEM GORDON, a/k/a "So Dope" Gordon

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

PENALTY SHEET

Defendant's Name: OMAR SHAQUILLE BAILEY

Case No: _____

Count #: 1

Conspiracy to Commit Wire Fraud and Bank Fraud

Title 18, United States Code, Section 1349

*** Max. Penalty:** Thirty (30) years' imprisonment

***Refers only to possible term of incarceration, does not include possible fines, restitution, special assessments, parole terms, or forfeitures that may be applicable.**