

MRM:CCC
F.#2021R00374

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

ADRIAN LAWRENCE,
also known as "Mastermind,"

Defendant.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

1. In or about and between October 2013 and April 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ADRIAN LAWRENCE, also known as "Mastermind," together with others, devised and executed a scheme to defraud elderly individuals throughout the United States (the "Victims") and to obtain money and property from them by falsely telling the Victims that they had won certain sweepstakes contests that were sponsored by, among other entities, Publishers Clearing House and federal agencies, such as the Federal Trade Commission.

2. It was a further part of the scheme to defraud that the defendant ADRIAN LAWRENCE, also known as "Mastermind," and his co-conspirators falsely told the Victims that in order to facilitate the release of their sweepstakes prizes, the Victims first needed to wire-transfer money to various bank accounts that the defendant had his co-conspirators establish at

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U.S. DISTRICT COURT E.D.N.Y.
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LONG ISLAND OFFICE
INDICTMENT
C R No. **22 159**
(T. 18, U.S.C., §§ 981(a)(1)(C), 1341,
1343, 1349, 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))
AZHACK, J.
SHIELDS, M.J.

bank branches in the Eastern District of New York, and to mail checks and cash to the defendant's co-conspirators throughout the United States, including in the Eastern District of New York, in order to pay for purported fees. However, the defendant and his co-conspirators knew that the Victims owed no fees, and had won no sweepstakes prizes. As a result of the scheme, at least 50 victims sent more than \$5.6 million in total to the defendant and his co-conspirators.

COUNT ONE
(Conspiracy to Commit Mail and Wire Fraud)

3. The allegations contained in paragraphs one and two are realleged and incorporated as if fully set forth in this paragraph.

4. In or about and between October 2013 and April 2020, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ADRIAN LAWRENCE, also known as "Mastermind," together with others, did knowingly and intentionally conspire to devise a scheme and artifice to defraud the Victims, and to obtain money and property from them by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, (a) to place in a post office and authorized depository for mail matter one or more matters and things to be sent and delivered by the United States Postal Service, and to deposit and cause to be deposited one or more matters and things to be sent and delivered by one or more private and commercial interstate carriers, and to take and receive therefrom such matters and things, and knowingly cause to be delivered by mail and such carriers according to the direction thereon such matters and things, contrary to Title 18, United States Code, Section 1341, and (b) to transmit and cause to be transmitted, by means of wire communication in interstate and foreign

commerce, writings, signs, signals, pictures and sounds, contrary to Title 18, United States Code, Section 1343.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNTS TWO THROUGH FIVE
(Wire Fraud)

5. The allegations contained in paragraphs one and two are realleged and incorporated as if fully set forth in this paragraph.

6. On or about the dates set forth below, within the Eastern District of New York and elsewhere, the defendant ADRIAN LAWRENCE, also known as “Mastermind,” together with others, did knowingly and intentionally devise a scheme and artifice to defraud John Doe, Jane Doe 1 and Jane Doe 2, individuals whose identities are known to the Grand Jury, and to obtain money and property from John Doe, Jane Doe 1 and Jane Doe 2 by means of materially false and fraudulent pretenses, representations and promises, and, for the purpose of executing such scheme and artifice and attempting to do so, did transmit and cause to be transmitted, by means of wire communication in interstate and foreign commerce, writings, signs, signals, pictures and sounds, to wit:

Count	Approximate Date of Wire Transmission	Description of Wire Transmission
TWO	July 8, 2017	\$500 wire transfer from Jane Doe 1 in Hawaii via Western Union to a co-conspirator in Brooklyn, New York
THREE	July 18, 2018	\$10,500 wire transfer from Jane Doe 2’s account at Chase Bank in Arizona to an account of a co-conspirator in Elmont, New York
FOUR	August 2, 2018	\$30,000 wire transfer from Jane Doe 2’s account at Chase Bank in Arizona to an account of a co-conspirator in Elmont, New York

Count	Approximate Date of Wire Transmission	Description of Wire Transmission
FIVE	August 16, 2018	\$40,000 wire transfer from John Doe's account at Chase Bank in Florida to an account of a co-conspirator in Brooklyn, New York

(Title 18, United States Code, Sections 1343, 2 and 3551 et seq.)

COUNT SIX

(Mail Fraud)

7. The allegations contained in paragraphs one and two are realleged and incorporated as if fully set forth in this paragraph.

8. On or about August 6, 2018, within the Eastern District of New York and elsewhere, the defendant ADRIAN LAWRENCE, also known as "Mastermind," together with others, did knowingly and intentionally devise a scheme and artifice to defraud Jane Doe 3, an individual whose identity is known to the Grand Jury, and to obtain money and property from Jane Doe 3 by means of materially false and fraudulent pretenses, representations and promises, and, for the purpose of executing such scheme and artifice and attempting to do so, did knowingly cause to be delivered by mail and private and commercial interstate carrier according to the direction thereon mail matter, to wit: a package containing United States currency to a co-conspirator.

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

9. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any

property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses.

10. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(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))

A TRUE BILL


FOREPERSON


BREONTAGE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ARIAN LAWRENCE also known as "Mastermind,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 981(a)(1)(C), 1341, 1343, 1349, 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Christopher C. Caffarone Assistant U.S. Attorney (631) 715-7868

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