

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION

2017 JUL -5 AM 11:43
US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:17-cr- 155-01-416JK

18 U.S.C. § 1349

18 U.S.C. § 1343

JOHN PIERRE MACK III

a/k/a James Dickson

a/k/a Jake Sims

a/k/a Jim Davis

a/k/a Mike Steverson

RONNIE ROLLAND MONTGOMERY

a/k/a Abdullah Raheem

a/k/a Robert Brown

a/k/a Charles Roberts

a/k/a Gary Stevens

DAVID AUGUSTA JONES III

a/k/a Da Da

a/k/a John Larry

DILLON MCDOWELL

a/k/a Flash

a/k/a Jon Rogan

AMARYLLIS PAGAN

a/k/a Jane Rogan

ASHLEY FERRELL

INDICTMENT

The Grand Jury charges:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

A. Introduction

At times material to this Indictment:

1. The Department of Homeland Security (DHS) is an executive branch of the United States government, responsible for preventing terrorism and enhancing security, securing and managing the borders of the United States, enforcing and administering the immigration laws of the United States, safeguarding and securing cyberspace, and ensuring resilience to disasters.
2. Homeland Security Investigations (HSI) is the investigative branch of the DHS.
3. HSI's Cyber Crimes Center (C3) delivers computer-based technical services to support domestic and international investigations into cross-border crime.
4. The Cyber Crimes Unit, the Child Exploitation Investigations Unit, and the Computer Forensics Unit are sub-units of C3.
5. Ria, MoneyGram, and Western Union are three money services businesses (MSBs), which facilitate the transfer of money by using, in relevant part, money transmission (or wire transfer) services.

6. Ria, MoneyGram, and Western Union sometimes offer their money transmission services through an authorized agent, one of which is Walmart.

B. The Conspiracy

7. Beginning on an unknown date, but at least as early as on or about August 1, 2015, and continuing thereafter, through and including at least on or about June 6, 2017, in the Middle District of Florida, and elsewhere, the defendants,

JOHN PIERRE MACK III
a/k/a James Dickson
a/k/a Jake Sims
a/k/a Jim Davis
a/k/a Mike Steverson
RONNIE ROLLAND MONTGOMERY
a/k/a Abdullah Raheem
a/k/a Robert Brown
a/k/a Charles Roberts
a/k/a Gary Stevens
DAVID AUGUSTA JONES III
a/k/a Da Da
a/k/a John Larry
DILLON MCDOWELL
a/k/a Flash
a/k/a Jon Rogan
AMARYLLIS PAGAN
a/k/a Jane Rogan
ASHLEY FERRELL,

(hereinafter collectively referred to as the “Defendants” for Count One)
knowingly and willfully did conspire with each other and with other

individuals, both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly, willfully, and with intent to defraud devise, and intend to devise, a scheme and artifice to defraud, and for obtaining money and property 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, to transmit and cause to be transmitted, by means of wire, radio, and television communications in interstate commerce, writings, signs, signals, and sounds, in violation of 18 U.S.C. § 1343.

C. Manner and Means of the Conspiracy

8. The manner and means used to accomplish the objects of the conspiracy included, among others, the following:

a. It was part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did use the internet to place fraudulent posts on adult dating websites.

b. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did communicate with individuals who responded to their fraudulent posts (hereinafter “the Victims”) by emails and phone calls, under the false pretense of being a female seeking companionship.

c. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did email and call the Victims and materially misrepresent themselves as federal agents assigned to the “C3 Child Exploitation Division” or other components of the DHS.

d. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did contact the Victims from fraudulent email addresses that appeared to be from a law enforcement agency, e.g., “c3childexploitaiondivision@gmail.com” [sic], to further defraud the Victims into believing the communications were from a federal agent.

e. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury, while pretending to be federal agents, would and did falsely accuse the Victims of soliciting a minor on the internet and falsely claim that there was an outstanding warrant for the Victims’ arrest.

f. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury, while pretending to be federal agents, would and did inform the Victims that they could pay a “fine”

or “fees” (hereafter “Payments”) so that the purported warrant would be “purged” or “cleared.”

g. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury, while pretending to be federal agents, would and did direct the Victims to go to various Walmart locations located in the Middle District of Florida, and use either Ria, MoneyGram, or Western Union to wire the Payments.

h. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury, while pretending to be federal agents, would and did direct the Victims to wire these Payments to one of the conspirators, either using a conspirator’s real name or an alias.

i. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did receive the Payments wired by the Victims at various Walmart locations located in the Middle District of Florida.

j. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did use their real identification cards or fraudulent identification cards in their aliases to pick up the Payments wired by the Victims.

k. It was further part of the conspiracy that the Defendants and others known and unknown to the Grand Jury would and did perpetuate their scheme by trading Victims amongst themselves, so that a different co-conspirator could re-initiate contact with a previous Victim under the same false pretenses described above and demand more Payments.

l. It was further part of the conspiracy that the Defendants would and did misrepresent, conceal, and hide, and cause to be misrepresented, concealed, and hidden, the purpose of acts committed in furtherance of the conspiracy.

All in violation of 18 U.S.C. § 1349.

COUNTS TWO THROUGH TWENTY-FIVE
(Wire Fraud)

A. Introduction

9. The allegations contained in paragraphs 1 through 6 of Count One of this Indictment are hereby realleged and incorporated herein by reference.

B. The Scheme and Artifice

10. Beginning on an unknown date, but at least as early as on or about August 1, 2015, and continuing thereafter, through and including at

least on or about June 6, 2017, in the Middle District of Florida, and elsewhere, the defendants,

JOHN PIERRE MACK III
a/k/a James Dickson
a/k/a Jake Sims
a/k/a Jim Davis
a/k/a Mike Steverson
RONNIE ROLLAND MONTGOMERY
a/k/a Abdullah Raheem
a/k/a Robert Brown
a/k/a Charles Roberts
a/k/a Gary Stevens
DAVID AUGUSTA JONES III
a/k/a Da Da
a/k/a John Larry
DILLON MCDOWELL
a/k/a Flash
a/k/a Jon Rogan
AMARYLLIS PAGAN
a/k/a Jane Rogan
ASHLEY FERRELL,

(hereinafter collectively referred to as “Defendants” for Count Two) did knowingly, willfully, and with intent to defraud devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, that related to material facts, the substance of which scheme and artifice is described below.

C. Manner and Means of the Scheme and Artifice

11. The substance of the scheme and artifice and its manner and means are described in paragraph 8 of Count One of this Indictment, the allegations of which are repeated and realleged as if fully set forth herein.

D. Executions of the Scheme and Artifice

12. On or about the dates listed below, in the Middle District of Florida, and elsewhere, the named Defendants, aiding and abetting one another, for the purpose of executing the aforesaid scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations and promises, did knowingly, and with intent to defraud, transmit and cause to be transmitted by wire, radio, and television communication in interstate and foreign commerce, the following money writings, signs, signals, pictures, and sounds:

Count	Defendants Charged	Date	Wire
2	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	8/25/2015	Wire transfer of \$600 from M.L. to RONNIE ROLLAND MONTGOMERY, a/k/a Charles Roberts
3	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	1/2/2016	Wire transfer of \$2,468 from M.L. to RONNIE ROLLAND MONTGOMERY
4	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	1/6/2016	Wire transfer of \$387 from Z.G., to JOHN PIERRE MACK III

Count	Defendants Charged	Date	Wire
5	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	2/10/2016	Wire transfer of \$827 from G.I. to JOHN PIERRE MACK III, a/k/a Jim Davis
6	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	3/26/2016	Wire transfer of \$600 from M.B. to JOHN PIERRE MACK III, a/k/a Jim Davis
7	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	5/12/2016	Wire transfer of \$957 from A.G. to JOHN PIERRE MACK III, a/k/a Jake Sims
8	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	5/12/2016	Wire transfer of \$387 from M.L. to JOHN PIERRE MACK III, a/k/a Jake Sims
9	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	5/22/2016	Wire transfer of \$1,757 from G.C. to RONNIE ROLLAND MONTGOMERY, a/k/a Gary Stevens
10	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	7/7/2016	Wire transfer of \$1,468 from C.A. to DAVID AUGUSTA JONES III, a/k/a John Larry
11	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	8/19/2016	Wire transfer of \$600 from A.G., to RONNIE ROLLAND MONTGOMERY, a/k/a Gary Stevens
12	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY and DAVID AUGUSTA JONES III	8/25/2016	Wire transfer of \$900 from H.K. to DAVID AUGUSTA JONES III, a/k/a John Larry
13	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III and ASHLEY FERRELL	10/1/2016	Wire transfer of \$450 from A.G. to ASHLEY FERRELL
14	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III and ASHLEY FERRELL	10/3/2016	Wire transfer of \$1,034 from S.B. to JOHN PIERRE MACK III, a/k/a Jake Sims

15	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III and ASHLEY FERRELL	11/7/2016	Wire transfer of \$750 from T.F. to DAVID AUGUSTA JONES III, a/k/a John Larry
16	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III and ASHLEY FERRELL	12/28/2016	Wire transfer of \$1,200 from T.C. to RONNIE ROLLAND MONTGOMERY
17	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL and ASHLEY FERRELL	1/26/2017	Wire transfer of \$950 from J.W. to ASHLEY FERRELL
18	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL and ASHLEY FERRELL	1/30/2017	Wire transfer of \$600 from T.C. to DILLON MCDOWELL
19	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL and ASHLEY FERRELL	2/16/2017	Wire transfer of \$1,690 from S.B. to DILLON MCDOWELL
20	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL and ASHLEY FERRELL	2/16/2017	Wire transfer of \$1,600 from Z.G. to DILLON MCDOWELL, a/k/a Jon Rogan
21	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL and ASHLEY FERRELL	2/27/2017	Wire transfer of \$1,950 from T.C. to JOHN PIERRE MACK III, a/k/a James Dickson
22	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL, AMARYLLIS PAGAN, and ASHLEY FERRELL	4/3/2017	Wire transfer of \$200 from M.T.B. to AMARYLLIS PAGAN
23	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL, AMARYLLIS PAGAN, and ASHLEY FERRELL	4/24/17	Wire transfer of \$990 from T.C. to JOHN PIERRE MACK III
24	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL, AMARYLLIS PAGAN, and ASHLEY FERRELL	5/9/2017	Wire transfer of \$1,950 from H.K. to JOHN PIERRE MACK III, a/k/a James Dickson
25	JOHN PIERRE MACK III, RONNIE ROLLAND MONTGOMERY, DAVID AUGUSTA JONES III, DILLON MCDOWELL, AMARYLLIS PAGAN, and ASHLEY FERRELL	6/5/2017	Wire transfer of \$350 from B.W. to AMARYLLIS PAGAN, a/k/a Jane Rogan

All in violation of 18 U.S.C. §§ 1343 and 2.

FORFEITURE

1. The allegations contained in Counts One through Twenty-Five are incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. §§ 1349 or 1343, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense.

3. If any of the property described above, 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,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

A TRUE BILL,

Catherine Wasson
Foreperson

W. STEPHEN MULDROW
Acting United States Attorney

By: Christina R. Downes
Christina R. Downes
Special Assistant United States Attorney

By: Katherine M. Ho
Katherine M. Ho *for*
Assistant United States Attorney
Chief, Orlando Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA

vs.

JOHN PIERRE MACK III

a/k/a James Dickson

a/k/a Jake Sims

a/k/a Jim Davis

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RONNIE ROLLAND MONTGOMERY

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DAVID AUGUSTA JONES III

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a/k/a John Larry

DILLON MCDOWELL

a/k/a Flash

a/k/a Jon Rogan

AMARYLLIS PAGAN

a/k/a Jane Rogan

ASHLEY FERRELL

INDICTMENT

Violations: 18 U.S.C. § 1349
18 U.S.C. § 1343

A true bill,

Catherine Wasson
Foreperson

Filed in open court this 5th day

of July 2017.



Clerk

Bail \$ _____
