

ALB:CCC  
F.#2016R01043

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

JEROME MAXWELL,

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 October 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JEROME MAXWELL, 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, federal agencies, such as the Federal Trade Commission.

2. It was a further part of the scheme to defraud that the defendant JEROME MAXWELL 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 and his co-conspirators established at various bank branches in the Eastern District of New York and to mail checks to the defendant's place of employment in the

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

★ **APR 05 2017** ★

LONG ISLAND OFFICE

INDICTMENT

**CR 17 182**  
Cr. No.

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

**WEXLER, J.**

**LINDSAY, M.J.**

Bronx, New York and his home in Uniondale, New York, to pay for purported fees when, in truth and in fact, the defendant and his co-conspirators well knew and believed that the Victims owed no fees, and had won no sweepstakes prizes. Between approximately October 2013 and October 2016, at least 20 victims wire-transferred or mailed more than \$3.9 million to the defendant and his co-conspirators.

3. For example, in or about May 2016, Jane Doe, a 66-year-old resident of New Jersey whose identity is known to the Grand Jury, was told that she had won \$4 million in a sweepstakes contest and in order to facilitate the release of her prize money, she had to send money to the defendant JEROME MAXWELL and Co-conspirator #1, an individual whose identity is known to the Grand Jury. On or about May 24, 2016, Jane Doe mailed a package containing two \$20,000 cashier's checks payable to the defendant and Co-conspirator #1 (the "Package") via the United States Postal Service ("USPS") from New Jersey to the defendant's place of employment in the Bronx, New York. However, before the Package was delivered, the defendant asked the USPS to deliver the Package to his home in Uniondale, New York. The USPS thereafter delivered the Package to the defendant's home on or about May 26, 2016.

COUNT ONE

(Conspiracy to Commit Mail and Wire Fraud)

4. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

5. In or about and between October 2013 and October 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JEROME MAXWELL, 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, mail matter to be sent and delivered by the USPS; to deposit and cause to be deposited mail matter to be sent and delivered by a private and commercial interstate carrier, and take and receive therefrom; and to knowingly cause mail matter to be delivered by mail and a private and commercial interstate carrier according to the direction thereon, 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.)

COUNT TWO  
(Mail Fraud)

6. The allegations contained in paragraphs one through three are realleged and incorporated as if fully set forth in this paragraph.

7. On or about May 26, 2016, within the Eastern District of New York and elsewhere, the defendant JEROME MAXWELL, together with others, did knowingly and intentionally devise a scheme and artifice to defraud Jane Doe, and to obtain money and property from Jane Doe 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, knowingly cause mail matter to be delivered by mail and private and commercial interstate

carrier according to the direction thereon, to wit: a package containing two \$20,000 cashier's checks payable to the defendant and Co-conspirator #1.

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

CRIMINAL FORFEITURE ALLEGATION

8. The United States hereby gives notice to the defendant that, upon his conviction of either 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.

9. 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

  
BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

F. #20\_R\_\_  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

---

**UNITED STATES DISTRICT COURT**

EASTERN DISTRICT OF NEW YORK

CRIMINAL DIVISION

---

THE UNITED STATES OF AMERICA

vs.

JEROME MAXWELL,  
Defendant.

---

**INDICTMENT**

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

*A true bill.*

*Janell Schiavo*

-----  
*Foreperson*

Filed in open court this \_\_\_\_\_ day, of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

-----  
*Clerk*

Bail, \$ \_\_\_\_\_

---

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

**FILED**  
IN CLERK'S OFFICE  
U.S. DISTRICT COURT E.D.N.Y.

**INFORMATION SHEET**

★ **APR 05 2017** ★

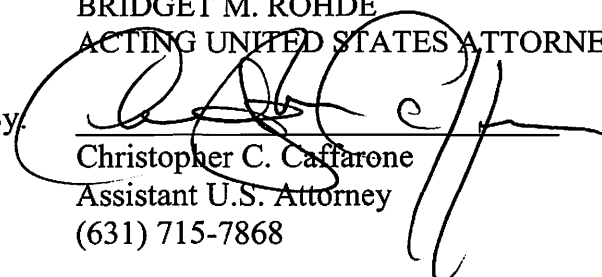
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK LONG ISLAND OFFICE

**CR 17 182**

- 1. Title of Case: United States v. Jerome Maxwell
- 2. Related Magistrate Docket Number(s): 16-M-944
- 3. Arrest Date: Click here to enter a date.
- 4. Nature of offense(s):  Felony **WEXLER, J.**  
 Misdemeanor **LINDSAY, M.J.**
- 5. Related Cases - Title and Docket No(s). (Pursuant to Rule 50.3.2 of the Local E.D.N.Y. Division of Business Rules): N/A
- 6. Projected Length of Trial: Less than 6 weeks   
More than 6 weeks
- 7. County in which crime was allegedly committed: Nassau/Suffolk  
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
- 8. Was any aspect of the investigation, inquiry and prosecution giving rise to the case pending or initiated before March 10, 2012.<sup>1</sup>  Yes  No
- 9. Has this indictment/information been ordered sealed?  Yes  No
- 10. Have arrest warrants been ordered?  Yes  No
- 11. Is there a capital count included in the indictment?  Yes  No

BRIDGET M. ROHDE  
ACTING UNITED STATES ATTORNEY

By.

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

<sup>1</sup> Judge Brodie will not accept cases that were initiated before March 10, 2012.