

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
v. : Crim. No.
RICARDO REID : 18 U.S.C. § 1349

INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

1. At all times relevant to this Indictment, the defendant Ricardo Reid (“defendant Reid”) was a resident of Jamaica, West Indies.

Conspiracy to Defraud

2. From in or about 2011, through in or about February 2016, in Essex County, in the District of New Jersey, and elsewhere, the defendant,

RICARDO REID,

did knowingly and intentionally conspire and agree with others 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, and, for the purpose of executing such scheme and artifice to defraud, to use the United States mails, private and commercial carriers, and wire communications in interstate and foreign commerce, contrary to Title 18, United States Code, Sections 1341 and 1343.

Object of the Conspiracy

3. It was the object of the conspiracy for defendant REID and his co-conspirators to enrich themselves by obtaining money from elderly and vulnerable individuals in the United States and Canada, through a scheme to trick these victims into believing they had won millions of dollars in a lottery or sweepstakes.

Means and Methods of the Conspiracy

4. It was part of the conspiracy that defendant REID and his co-conspirators would purchase "client lists" of elderly and vulnerable individuals (the "Elderly Victims") from brokers specializing in such information.

5. It was further part of the conspiracy that defendant REID and his co-conspirators would initiate contact with the Elderly Victims by telephone calls from Jamaica and falsely represent themselves to be lottery officials, bankers, or Internal Revenue Service ("IRS") agents.

6. It was further part of the conspiracy that defendant REID and his co-conspirators would then falsely inform the Elderly Victims that they had won millions of dollars in a lottery or sweepstakes, but that in order to redeem these winnings, they had to pay registration and/or other fees and taxes (the "Bogus Lottery Fees").

7. It was further part of the conspiracy that defendant REID and his coconspirators would direct the Elderly Victims to pay the Bogus Lottery Fees using several methods, for ultimate transfer to Jamaica, including mailing cash or money orders to other Elderly Victims or to other members of the conspiracy

in the United States, where it was then either smuggled to Jamaica or deposited into United States bank accounts and withdrawn from ATMs located in Jamaica. In other instances, the Elderly Victims were directed either to wire Bogus Lottery Fees to bank accounts held by other Elderly Victims or other co-conspirators, or to wire funds using Western Union or Money Gram directly to Jamaica.

8. It was further part of the conspiracy that defendant REID and his co-conspirators would generally direct the Elderly Victims to make repeated payments of Bogus Lottery Fees until either the Elderly Victim's funds were depleted or, after realizing they had been scammed, the Elderly Victims refused to make additional payments. At times, defendant REID and his coconspirators induced and caused the Elderly Victims to incur debt in order to pay the Bogus Lottery Fees.

9. It was further part of the conspiracy that defendant REID would conceal his identity using various methods, including the use of aliases including "Robert Gates," "Mr. Bogohazian," and "Damien Boswel," and the use of call forwarding and Magic Jack, a device that conceals the identity and location of the caller.

10. To effect the object of the conspiracy, the following acts, among others, were taken or caused:

a. Between in or around June 2014 and in or around April 2015, defendant REID induced Victim 1, an 88-year-old resident of Arkansas,

to wire and mail a total of approximately \$110,932.35 in Bogus Lottery Fees to various individuals and locations, as directed by defendant REID.

b. Between in or around July 2012 and in or around November 2014, defendant REID induced Victim 2, a 57-year-old resident of New Jersey, wired and mailed a total of approximately \$249,394.03 in Bogus Lottery Fees to various individuals and locations, as directed by defendant REID.


c. Between in or around November 2011 and in or around March 2015, defendant REID induced Victim 3, a 76-year-old resident of Canada, wired a total of approximately \$71,919.88 in Bogus Lottery Fees to various individuals and locations, as directed by defendant REID.

d. Between in or around March 2015, and in or around December 2015, defendant REID induced Victim 4, a 74-year-old resident of Puerto Rico, wired a total of approximately \$64,433.52 in Bogus Lottery Fees to various individuals and locations, as directed by defendant REID.

In violation of Title 18, United States Code, Section 1349.

A TRUE BILL

FOREPERSON



PAUL J. FISHMAN
United States Attorney

**United States District Court
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A True Bill,

Foreperson

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

LORRAINE S. GERSON
ASSISTANT U.S. ATTORNEY
973.645.2789

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