

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon.
v. : Criminal Number: 18-
DANIEL K. DXRAMS, : 18 U.S.C. §§ 1341, 1349, and 2
a/k/a "Daniel Kusi,"
a/k/a "Danny D. Dxrams,"
a/k/a "Randy N. Amoateng"

I N D I C T M E N T

Count One
Conspiracy to Commit Mail Fraud

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

Introduction

The Defendant and Others:

1. At various times relevant to this Indictment:
 - a. Daniel K. Dxrams, a/k/a "Daniel Kusi," a/k/a "Danny D. Dxrams," a/k/a "Randy N. Amoateng" ("Dxrams"), was a resident of Maplewood, New Jersey.
 - b. Co-Conspirator One, an individual not named as a defendant herein, was a resident of Elizabeth, New Jersey.
 - c. Co-Conspirator Two, an individual not named as a defendant herein, was a resident of Elizabeth, New Jersey.

The Victim Auto Leasing Companies

d. A company provided financing for the purchase of luxury cars ("Company One").

e. A company provided financing for the purchase of luxury cars ("Company Two").

f. A company provided financing for the purchase of luxury cars ("Company Three").

The Luxury Cars

g. In or about March 2013, defendant Dxrams leased a 2012 Bentley (the "Bentley"), and Company One was assigned the rights under this lease.

h. In or about March 2016, defendant Dxrams leased a 2016 Rolls Royce Coupe (the "Rolls Royce"), and Company Two provided the financing for the Rolls Royce.

i. In or about March 2015, defendant Dxrams leased a 2015 Mercedes-Benz ("MB-1"). In or about March 2015, defendant Dxrams' family member (the "Family Member") leased a 2016 Mercedes-Benz ("MB-2"). Company Three provided the financing for MB-1 and MB-2.

The Conspiracy

2. From in or about February 2017 through in or about July 2017, in Union and Essex Counties, in the District of New Jersey and elsewhere, defendant

DANIEL K. DXRAMS,
a/k/a "Daniel Kusi,"
a/k/a "Danny D. Dxrams,"
a/k/a "Randy N. Amoateng,"

knowingly and intentionally conspired and agreed with Co-Conspirator One, Co-Conspirator Two, and others to devise and intend to devise a scheme and artifice to defraud the Victim Auto Leasing Companies, as described in Paragraph 1d through 1f of this Count, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme and artifice to defraud, caused to be placed in a United States post office or other authorized depository for mail matter, items to be delivered by the United States Postal Service according to the directions thereon, and caused to be deposited items to be sent and delivered by private and commercial interstate carriers, as set forth below, contrary to Title 18, United States Code, Section 1341.

Object of the Conspiracy

3. The object of the conspiracy was to unlawfully obtain money and property by fraudulently discharging the lawful debts of defendant Dxrams and the Family Member.

Manner and Means of the Conspiracy

4. It was part of the conspiracy that defendant Dxrams provided information and documents, including payoff information related to the luxury cars, to Co-Conspirator One and Co-Conspirator Two.

5. It was further part of the conspiracy that defendant Dxrams, Co-Conspirator One, and Co-Conspirator Two made and caused to be made fraudulent cashier's checks, payable to the Victim Auto Leasing Companies, for the purpose of fraudulently discharging defendant Dxrams' and the Family Member's lawful financial obligations related to the luxury cars.

6. It was further part of the conspiracy that Co-Conspirator One, Co-Conspirator Two, and defendant Dxrams mailed and caused to be mailed the fraudulent cashier's checks to the Victim Auto Leasing Companies.

7. For example:

a. In or about February 2017, defendant Dxrams gave payoff quotes for the leases for MB-1, MB-2, and the Bentley, and the payoff amount for the mortgage on the Family Member's residence in Maplewood, New Jersey to Co-Conspirator One and Co-Conspirator Two.

b. On or about February 27, 2017, Co-Conspirator One made and signed a fraudulent cashier's check, payable to Company Three and in the approximate amount of \$51,000, as a payment of the lease for defendant Dxrams' MB-1. Thereafter, this fraudulent cashier's check was mailed to Company Three.

c. On or about February 27, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company One and in the approximate amount of \$101,000, as a payment of the lease for defendant Dxrams' Bentley. Thereafter, this fraudulent cashier's check was mailed to Company One. Although fraudulent, Company One accepted this cashier's check as a payoff of the Bentley and issued title to the Bentley to defendant Dxrams.

d. On or about February 27, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company Two and in the approximate amount of \$300,000, as payment of the lease for defendant Dxrams' Rolls Royce. Thereafter, this fraudulent cashier's check was mailed to Company Two.

e. On or about February 27, 2017, Co-Conspirator One signed another fraudulent cashier's check, payable to Company Two and in the approximate amount of \$300,000, as a second payment of the lease for defendant Dxrams' Rolls Royce. Thereafter, this fraudulent cashier's check was mailed to Company Two.

f. In or about March 2017, after receiving a fraudulent cashier's check in the approximate amount of \$51,000, Company Three released title of the MB-1 to defendant Dxrams.

g. On or about March 9, 2017, a fraudulent cashier's check, payable to Company Three and in the approximate amount of \$50,000, was mailed to Company Three as payment of the lease for the Family Member's MB-2.

h. On or before March 10, 2017, Company Three mailed a letter to defendant Dxrams, advising him that the \$51,000 payment, which payment resulted in him receiving title to MB-1, was returned unpaid by the bank. In this letter, Company Three advised defendant Dxrams that he owed \$51,063, the full balance of the lease, and it was a "serious matter."

i. On or about March 15, 2017, Company Three mailed a letter to defendant Dxrams' residence and addressed to the Family Member, advising the Family Member that the \$50,000 payment was returned unpaid by the bank.

j. In or about late March 2017, defendant Dxrams sold the Bentley to a third party for approximately \$82,000.

k. On or about March 30, 2017, defendant Dxrams issued a genuine cashier's check, in the approximate amount of \$25,000, to Co-Conspirator Two. On or about April 6, 2017, Co-Conspirator Two deposited this genuine cashier's check into his bank account.

l. On or about April 20, 2017, after receiving an e-mail from Company One concerning his Bentley account, defendant Dxrams replied via e-mail: "Hi, please make a note on the account that the car is being paid off within the next week. DX." Defendant Dxrams, who had sold the Bentley, did not make any payments to Company One for the Bentley.

m. On or about May 2, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company Three and in the approximate

amount of \$53,000, as payment of the lease of defendant Dxrams' MB-1.

Thereafter, this fraudulent cashier's check was mailed to Company Three.

n. On or about May 2, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company Two and in the approximate amount of \$300,000, as payment of the lease for defendant Dxrams' Rolls Royce. Thereafter, this fraudulent cashier's check was mailed to Company Two.

o. On or about June 21, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company Three and in the approximate amount of \$38,000, as payment of the lease for the Family Member's MB-2. Thereafter, this fraudulent cashier's check was mailed to Company Three.

p. On or about June 21, 2017, Co-Conspirator One signed a fraudulent cashier's check, payable to Company Three and in the approximate amount of \$116,000, as payment of the lease for the Family Member's MB-2. Thereafter, this fraudulent cashier's check was mailed to Company Three.

p. In or about late July 2017, defendant Dxrams filed a lawsuit in federal court in the District of New Jersey, wherein he falsely asserted that he had paid off the Bentley in full with certified funds on or about February 27, 2017, namely, the fraudulent \$101,000 cashier's check signed by Co-Conspirator One.

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

Counts Two Through Ten
(Mail Fraud)

1. The allegation set forth in Paragraph 1 and Paragraphs 3 through 7 of Count One of this Indictment are realleged and incorporated as if set forth herein.

The Charges

2. On or about or about the dates set forth below, for the purpose of executing the scheme and artifice to defraud, and attempting to do so, in Union and Essex Counties, in the District of New Jersey and elsewhere, defendant

DANIEL K. DXRAMS,
a/k/a "Daniel Kusi,"
a/k/a "Danny D. Dxrams,"
a/k/a "Randy N. Amoaeng"

knowingly caused to be placed in a United States post office and other authorized depository for mail matter, and aided and abetted the same, items to be delivered by the United States Postal Service according to the directions thereon, and caused to be deposited items to be sent and delivered by private and commercial interstate carriers, as set forth below:

Count	Approximate Date of Mailing	Payee	Description of Mail Matter
2	February 27, 2017	Company One	A fraudulent cashier's check, in the approximate amount of \$101,000, as a payment for defendant Dxrams' Bentley.
3	February 27, 2017	Company Two	A fraudulent cashier's check, in the approximate amount of \$300,000, as a payment for defendant Dxrams' Rolls Royce.

Count	Approximate Date of Mailing	Payee	Description of Mail Matter
4	February 27, 2017	Company Two	A fraudulent cashier's check, in the approximate amount of \$300,000, as a payment for defendant Dxrams' Rolls Royce.
5	February 27, 2017	Company Three	A fraudulent cashier's check, in the approximate amount of \$51,000, as a payment for defendant Dxrams' MB-1.
6	March 9, 2017	Company Three	A fraudulent cashier's check, in the approximate amount of \$50,000, as a payment for MB-2, a car leased by the Family Member.
7	May 2, 2017	Company Three	A fraudulent cashier's check, in the approximate amount of \$53,000, as a payment for defendant Dxrams' MB-1.
8	May 2, 2017	Company Two	A fraudulent cashier's check, in the approximate amount of \$300,000, as a payment for defendant Dxrams' Rolls Royce.
9	June 21, 2017	Company Three	A fraudulent cashier's check, in the approximate amount of \$38,000, as a payment for MB-2, a car leased by the Family Member.
10	June 21, 2017	Company Three	A fraudulent cashier's check, in the approximate amount of \$116,000, as a payment for MB-2, a car leased by the Family Member.

All in violation of Title 18, United States Code, Sections 1341, 1349, and 2.

A TRUE BILL

Foreperson


CRAIG CARPENITO
United States Attorney

CASE NUMBER: _____

**United States District Court
District of New Jersey**

UNITED STATES OF AMERICA

v.

DANIEL K. DXRAMS,
a/k/a "Daniel Kusi,"
a/k/a "Danny D. Dxrams,"
a/k/a "Randy N. Amoateng"

INDICTMENT FOR

18 U.S.C. §§ 1341, 1349, and 2

A True Bill,

Foreperson

CRAIG CARPENITO
UNITED STATES ATTORNEY
FOR THE DISTRICT OF NEW JERSEY

ANTHONY MOSCATO
ASSISTANT U.S. ATTORNEY
NEWARK, NEW JERSEY
973-645-2752
