

2013R00332/MTS

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Criminal No. 14- 136- JBS
:
v. : 18 U.S.C. §§ 1349, 1344,
: 922(g), and 2
IBN MUHAMMAD, :
a/k/a "E," :
JOSEPH REEVEY, : INDICTMENT
a/k/a "Power," :
a/k/a "V.I.," and :
IVORY VERNON, :
a/k/a "Ivy," :
a/k/a "Amy" :

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

COUNT 1

(Bank Fraud Conspiracy)

The Defendants, The Co-conspirators, and The Victims

1. At all times relevant to this Indictment:

a. Defendant IBN MUHAMMAD, a/k/a "E," resided
in either New Jersey or Pennsylvania.

b. Defendant JOSEPH REEVEY, a/k/a "Power,"
a/k/a "V.I.," resided in either New Jersey or Pennsylvania.

c. Defendant IVORY VERNON, a/k/a "Ivy," a/k/a
"Amy," resided in New Jersey.

d. Derrick Warner, a/k/a "Money," a/k/a "Chink," a/k/a "Black," a/k/a "John," who is named as a co-conspirator but not as a defendant herein, resided in New Jersey.

e. Vonecia B. Rhynes, who is named as a co-conspirator but not as a defendant herein, resided in New Jersey.

2. At all times relevant to this Indictment, Wilmington Savings Fund Society ("WSFS"), Fulton Bank of New Jersey, TD Bank, Bank Of America, M&T Bank, National Penn Bank, PNC Bank, Sun National Bank, and Susquehanna Bank (hereinafter, the "Victim Banks") were financial institutions as defined in Title 18, United States Code, Section 20, whose deposits were insured by the Federal Deposit Insurance Corporation.

The Conspiracy

3. From in or about August 6, 2012 through on or about August 1, 2013, in Camden County, in the District of New Jersey and elsewhere, the defendants,

IBN MUHAMMAD,
a/k/a "E,"
JOSEPH REEVEY,
a/k/a "Power,"
a/k/a "V.I.," and
IVORY VERNON,
a/k/a "Ivy,"
a/k/a "Amy"

did knowingly and intentionally conspire and agree with each other, Derrick Warner, Vonecia B. Rhynes and others, to execute a scheme and artifice to defraud financial institutions, namely the Victim Banks, and to obtain moneys, funds, assets, securities, and other property owned by, and under the custody and control of, the financial institutions by means of materially false and fraudulent pretenses, representations, and promises, contrary to Title 18, United States Code, Section 1344.

The Object of the Conspiracy

4. It was the object of the conspiracy to obtain money by stealing checks from the United States Mails, converting the stolen checks to the defendants' and their co-conspirators' own use, altering or forging the stolen checks, and cashing or having others cash the stolen checks at financial institutions.

The Manner and Means of the Conspiracy

5. It was part of the conspiracy that defendants IBN MUHAMMAD, a/k/a "E," JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," and IVORY VERNON, a/k/a "Ivy," a/k/a "Amy" along with their co-conspirators, stole from the United States Mails and converted to their own use, over 100 business checks, from various

businesses in the District of New Jersey, the Commonwealth of Pennsylvania, the State of Delaware, and elsewhere.

6. It was further part of the conspiracy that defendant JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," and his co-conspirator Derrick Warner, and others recruited individuals (collectively, the "Check Cashers") in and around New Jersey to present the stolen checks at Victim Banks.

7. It was further part of the conspiracy that defendant IBN MUHAMMAD, a/k/a "E," and others, altered the stolen business checks and forged the names of the payee to match the name of a recruited Check Casher.

8. It was further part of the conspiracy that defendants JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," and IVORY VERNON, a/k/a "Ivy," a/k/a "Amy" and their co-conspirators Derrick Warner and Vonecia B. Rhynes, and others, transported and caused to be transported the Check Cashers from various locations in New Jersey to Victim Banks located throughout New Jersey, Pennsylvania, and Delaware.

9. It was further part of the conspiracy that, at the request of and with direction from co-conspirator Derrick Warner, co-conspirator Vonecia B. Rhynes rented cars on behalf of defendant Derrick Warner at Bargain Rent-A-Car of America (hereinafter, "Bargain Rent-A-Car") in Somerdale, New Jersey

that were used to transport Check Cashers from various locations in New Jersey to Victim Banks located throughout New Jersey, Pennsylvania, and Delaware. Moreover, on one occasion, at the request of and with direction from defendant IVORY VERNON, a/k/a "Ivy," a/k/a "Amy," co-conspirator Vonecia B. Rhynes rented a car on behalf of defendant IVORY VERNON, a/k/a "Ivy," a/k/a "Amy," and co-conspirator Derrick Warner at Bargain Rent-A-Car. On at least one occasion, defendant JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," also rented a car at Bargain Rent-A-Car for use during the conspiracy.

10. It was further part of the conspiracy that defendants IBN MUHAMMAD, a/k/a "E," and JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," and co-conspirator Derrick Warner directed the Check Cashers to present the altered and forged business checks at the Victim Banks in an effort to fraudulently obtain money. At times, defendant IVORY VERNON, a/k/a "Ivy," a/k/a "Amy," and co-conspirator Vonecia B. Rhynes served as co-conspirator Derrick Warner's driver as they drove Check Cashers to various Victim Banks. To this end, the Check Cashers fraudulently cashed or attempted to cash over 45 altered and forged business checks at the Victim Banks resulting in over \$100,000 in losses to the Victim Banks and \$100,000 in attempted losses.

11. It was further part of the conspiracy that defendants IBN MUHAMMAD, a/k/a "E," JOSEPH REEVEY, a/k/a "Power," a/k/a "V.I.," and IVORY VERNON, a/k/a "Ivy," a/k/a "Amy," and their co-conspirators Derrick Warner and Vonecia B. Rhynes and others shared the proceeds of the scheme and artifice to defraud with each other and with the Check Cashers.

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

COUNT 2

(Bank Fraud)

1. Paragraphs 1, 2, and 4-11 of Count 1 of this Indictment are realleged and incorporated herein.

2. On or about September 19, 2012, in Camden County, in the District of New Jersey, and elsewhere, the defendants,

IBN MUHAMMAD,
a/k/a "E," and
JOSEPH REEVEY,
a/k/a "Power,"
a/k/a "V.I.,"

did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, namely Sun National Bank, and to obtain money, funds, assets, securities, and other property owned by, and under the custody and control of the financial institution, by means of materially false and fraudulent pretenses, representations, and promises, specifically, Check Cashier T.S.'s attempted cashing of a \$3,206.00 stolen and altered business check at Sun National Bank in New Jersey.

In violation of Title 18, United States Code, Section
1344, and Title 18, United States Code, Section 2.

COUNTS 3-5

(Bank Fraud)

1. Paragraphs 1, 2, and 4-11 of Count 1 of this Indictment are realleged and incorporated herein.

2. On or about the following dates, in Camden County, in the District of New Jersey, and elsewhere, the defendants,

IBN MUHAMMAD,
a/k/a "E," and
JOSEPH REEVEY,
a/k/a "Power,"
a/k/a "V.I.,"

along with co-conspirator Derrick Warner, did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, namely WSFS, and to obtain money, funds, assets, securities, and other property owned by, and under the custody and control of the financial institution, by means of materially false and fraudulent pretenses, representations, and promises, specifically by either Check Cashers A.G.'s or A.R.'s cashing or attempted cashing of a stolen and altered business check on the following dates and at the following location:

COUNT	DATE	LOCATION OF FINANCIAL INSTITUTION	AMOUNT	CHECK CASHER
3	03/02/13	Delaware	\$3,920.00 (cashed)	A.G.
4	03/02/13	Delaware	\$4,512.78 (attempt)	A.R.
5	03/07/13	Delaware	\$3,922.17 (attempt)	A.G.

In violation of Title 18, United States Code, Section
1344, and Title 18, United States Code, Section 2.

COUNTS 6-8

(Bank Fraud)

1. Paragraphs 1, 2, and 4-11 of Count 1 of this Indictment are realleged and incorporated herein.

2. On or about the following dates, in Camden County, in the District of New Jersey, and elsewhere, the defendants,

IBN MUHAMMAD,
a/k/a "E," and
IVORY VERNON,
a/k/a "Ivy,"
a/k/a "Amy,"

along with co-conspirator Derrick Warner, did knowingly execute and attempt to execute a scheme and artifice to defraud a financial institution, namely TD Bank, and to obtain money, funds, assets, securities, and other property owned by, and under the custody and control of the financial institution, by means of materially false and fraudulent pretenses, representations, and promises, specifically by Check Casher G.B.'s cashing or attempted cashing of a stolen and altered business check on the following dates and at the following location:

COUNT	DATE	LOCATION OF FINANCIAL INSTITUTION	AMOUNT	CHECK CASHER
6	05/06/13	Pennsylvania	\$5,670.56 (cashed)	G.B.
7	05/06/13	Pennsylvania	\$4,926.98 (cashed)	G.B.
8	05/06/13	Pennsylvania	\$4,760.64 (cashed)	G.B.

In violation of Title 18, United States Code, Section
1344, and Title 18, United States Code, Section 2.

COUNT 9

(Felon in Possession of a Firearm)

On or about May 20, 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

IBN MUHAMMAD,
a/k/a "E,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court in the State of New Jersey, did knowingly possess in or affecting commerce, a firearm, namely a Smith & Wesson, Model 629-1, .44 Magnum handgun, bearing serial number AFP0714.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 10

(Felon in Possession of a Firearm)

On or about May 20, 2013, in Camden County, in the District of New Jersey, and elsewhere, the defendant,

IBN MUHAMMAD,
a/k/a "E,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in the Superior Court in the State of New Jersey, did knowingly possess in or affecting commerce, a firearm, namely a Browning model Buck Mark, .22 caliber pistol, bearing serial number 655NT06215.

In violation of Title 18, United States Code, Section 922(g)(1).

FORFEITURE ALLEGATIONS

1. The allegations contained in Counts 9 (on page 13) and 10 (on page 14) of this Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses in violation of Title 18, United States Code, Section 922(g) set forth in Counts 9 (on page 13) and 10 (on page 14) of this Indictment, the defendant,

IBN MUHAMMAD,
a/k/a "E,"

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of that offense, including the following:

a Smith & Wesson, Model 629-1, .44 Magnum
handgun, bearing serial number AFP0714 (Count 9);
and

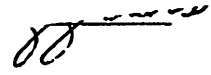
a Browning model Buck Mark, .22 caliber pistol,
bearing serial number 655NT06215 (Count 10)

All pursuant to Title 18, United States Code, Section
924(d) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

FOREPERSON


PAUL J. FISHMAN
United States Attorney



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United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

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IVORY VERNON,
a/k/a "Ivy,"
a/k/a "Amy"

INDICTMENT FOR
Title 18 United States Code
Sections 1349, 1344, 922(g), and 2

A True Bill,

Foreperson *OC*

PAUL J. FISHMAN
UNITED STATES ATTORNEY
NEWARK, NEW JERSEY

MATTHEW T. SMITH
ASSISTANT UNITED STATES ATTORNEY
CAMDEN, NEW JERSEY
856-757-5026
