

FILED

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION
MAY 31 AM 8:34
US DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v.

CASE NO. 6:18-cr-124-01-376JK

ROBERT BLAKE MADURIE
TREYSIER MIKAEL LAPALME
ORAL ANTHONY STEWART
DANNY LOPEZ
NADINE BROMFIELD ALEXANDER
SHAMEER HASSAN

18 U.S.C. § 1349
18 U.S.C. § 1343
18 U.S.C. § 1956(h)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1028A(a)(1)

INDICTMENT

The Grand Jury Charges:

COUNT ONE
(Conspiracy to Commit Wire Fraud)

At all times material to this Indictment:

Introduction

1. Defendant **ROBERT BLAKE MADURIE**, a Jamaican citizen residing in the Middle District of Florida and elsewhere, together with his co-defendants and co-conspirators, operated a fraudulent sweepstakes scheme in Jamaica, the Middle District of Florida and elsewhere. **MADURIE** falsely informed victims in the United States that they had won a prize in a sweepstakes and had to send money to the United States or Jamaica to pay various fees and taxes necessary to retrieve their prize. **MADURIE** also

received in the Middle District of Florida funds from victims and then, after retaining a percentage, wired the remaining funds to his co-conspirators in Jamaica.

2. Defendant **TREYSIER MIKAEL LAPALME**, a United States citizen residing in the Middle District of Florida and elsewhere, falsely informed victims that they had won a prize in a sweepstakes and had to send money to the United States or Jamaica to pay various fees and taxes necessary to retrieve their prize. **LAPALME** also received in the Middle District of Florida funds from victims and then, after retaining a percentage, wired the remaining funds to his co-conspirators in Jamaica.

3. Defendant **ORAL ANTHONY STEWART**, a Jamaican citizen residing in the Middle District of Florida, received in the Middle District of Florida funds from victims and then, after retaining a percentage, wired the remaining funds to his co-conspirators in Jamaica.

4. Defendant **DANNY LOPEZ**, a United States citizen residing in the Middle District of Florida, received in the Middle District of Florida funds from victims and then, after retaining a percentage, wired the remaining funds to his co-conspirators in Jamaica.

5. Defendant **NADINE BROMFIELD ALEXANDER**, a United States citizen residing in the Middle District of Florida and elsewhere,

obtained from her workplace the names, addresses, social security numbers, driver's licenses, dates of birth and other means of identification belonging to individuals and sold or transferred the personal identity information to her co-defendants and co-conspirators. **ALEXANDER** also received in the Middle District of Florida funds from victims and then, after retaining a percentage, wired the remaining funds to her co-conspirators in Jamaica.

6. Defendant **SHAMEER HASSAN**, a United States citizen residing in the Middle District of Florida, owned the Golden Krust Jamaican Bakery and Grill located in the Middle District of Florida and operated as a money transmitter agent for JN Money Services (USA) Inc. and Western Union from that location. **HASSAN** wired victim funds to co-conspirators in Jamaica through his JN and Western Union accounts.

The Conspiracy

7. Beginning in or about February 2012, the exact date being unknown to the Grand Jury, and continuing to in or about October 2014, in the Middle District of Florida and elsewhere, the defendants,

**ROBERT BLAKE MADURIE
TREYSIER MIKAEL LAPALME
ORAL ANTHONY STEWART
DANNY LOPEZ
NADINE BROMFIELD ALEXANDER
SHAMEER HASSAN**

did knowingly and willfully combine, conspire, and agree with each other and with persons known and unknown to the Grand Jury, to knowingly and willfully 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 purposes of executing and attempting to execute the scheme and artifice to defraud, did knowingly and willfully transmit and cause to be transmitted by means of wire in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, in violation of 18 U.S.C. § 1343.

Purpose of the Conspiracy

8. It was the purpose of the conspiracy that the defendants and their co-conspirators would enrich themselves by fraudulently inducing victims to send them money in exchange for falsely promised sweepstakes prizes.

Manner and Means of the Conspiracy

9. It was part of the conspiracy and scheme to defraud, and among the manner and means by which the defendants and their co-conspirators carried out the conspiracy in the Middle District of Florida and elsewhere, that:

a. Beginning in about February 2012, the defendants and their co-conspirators operated a fraudulent sweepstakes scheme in Jamaica and the Middle District of Florida.

b. The defendants and their co-conspirators would target victims who were residents of the United States and, using aliases, would falsely inform those victims by telephone that they had won a prize in a sweepstakes contest. The defendants and their co-conspirators would then falsely tell their victims that, in order to receive their prize, the victims had to send money via Western Union or MoneyGram wire transfers, bank wire transfers, Green Dot MoneyPaks and other methods to “representatives” in the United States to prepay fees and taxes on the prize.

c. The defendants and their co-conspirators would further induce their victims to send money by falsely representing that they were representatives of a United States government agency charged with verifying the sweepstakes prize, verifying the fees and taxes, and ensuring that sweepstakes winners would receive their purported prize money.

d. If a victim agreed to send money, the defendants and their co-conspirators would instruct the victim to send a wire transfer or check to a designated defendant, or purchase a Green Dot MoneyPak and provide the

MoneyPak number to the defendants and their co-conspirators so that they could electronically access the funds.

e. After the defendants received the victim's funds, the defendants and their co-conspirators would convert or transfer the funds to prepaid debit cards, money orders or cash and instruct defendant **SHAMEER HASSAN** by text message or in person to transmit the funds to their co-conspirators in Jamaica.

f. To facilitate the scheme, the defendants and their co-conspirators would purchase stolen personal identity information from defendant **NADINE BROMFIELD ALEXANDER** and others, and use it to purchase prepaid debit cards to receive victim funds and to send wire transfers to Jamaica.

g. The defendants and their co-conspirators would instruct defendant **SHAMEER HASSAN** to send the wire transfers to co-conspirators in Jamaica using the stolen personal identity information, and would meet with him at the Golden Krust Bakery and elsewhere to reimburse him and pay him for the wire transfers to Jamaica.

h. After the defendants and their co-conspirators had successfully induced a victim to send money, the defendants and their co-conspirators would call the victim repeatedly to "reload" him or her, that is, to

make further false and fraudulent misrepresentations in an effort to induce the victim to send more money. Such false and fraudulent misrepresentations included, but were no limited to, statements that the victim had to send additional fees and taxes to ensure the safe delivery of the prize. This practice would continue as long as the victim continued to send money.

10. No victim of the conspiracy ever received a promised prize; the defendants and their co-conspirators kept all victim funds for their own personal benefit.

All in violation of 18 U.S.C. § 1349.

COUNTS TWO THROUGH TEN
(Wire Fraud)

11. The allegations in paragraphs 1 through 6 and 8 through 10 are incorporated here, with the allegations in paragraph 9 setting forth the defendants' scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises ("the scheme to defraud.").

12. On or about the dates set below, each such date constituting a separate count of the Indictment, in the Middle District of Florida and elsewhere, the defendants, together with others known and unknown to the Grand Jury, and for the purpose of executing the scheme to defraud, and attempting to do so, did knowingly and willfully transmit and cause to be

transmitted, by means of wire communication in interstate and foreign commerce the following writings, signals, and sounds, specifically Western Union wire transfers and Green Dot MoneyPak transfers:

Count	Date	Defendants	Sender Initials	Amount
Two	12/4/2013	Robert Blake Madurie Treysier Mikael LaPalme	RN	\$500
Three	12/5/2013	Robert Blake Madurie Danny Lopez	RN	\$2,200
Four	12/13/2013	Robert Blake Madurie	RN	\$3,000
Five	12/14/2013	Robert Blake Madurie	RN	\$1,950
Six	12/24/2013, 10:48 am	Robert Blake Madurie	RN	\$500
Seven	12/24/2013, 10:52 am	Robert Blake Madurie	RN	\$500
Eight	1/17/2014	Robert Blake Madurie	RN	\$1,800
Nine	1/22/2014	Robert Blake Madurie	RN	\$900
Ten	1/29/2014	Robert Blake Madurie	RN	\$900

In violation of 18 U.S.C. § 1343.

COUNT ELEVEN
(Conspiracy to Commit Money Laundering)

13. The allegations in paragraphs 1 through 6 and 8 through 10 are incorporated here.

14. Beginning in or about February 2012, the exact date being unknown to the Grand Jury, and continuing to in or about October 2014, in the Middle District of Florida and elsewhere, the defendants,

ROBERT BLAKE MADURIE
TREYSIER MIKAEL LAPALME
ORAL ANTHONY STEWART
DANNY LOPEZ
NADINE BROMFIELD ALEXANDER
SHAMEER HASSAN

did knowingly and willfully combine, conspire, confederate and agree together and with others who are known and unknown to the Grand Jury, to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions

represented the proceeds of some form of unlawful activity, in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

All in violation of 18 U.S.C. § 1956(h).

COUNTS TWELVE THROUGH TWENTY-TWO
(Concealment Money Laundering)

15. The allegations in paragraphs 1 through 6 and 8 through 10 are incorporated here.

16. On or about the dates set below, each such date constituting a separate count of the Indictment, in the Middle District of Florida and elsewhere, the defendants, together with others known and unknown to the Grand Jury, did knowingly conduct and attempt to conduct the below listed financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is wire fraud, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity:

Count	Date	Defendants	Financial Transaction	Amount
Twelve	6/8/2013	Nadine Bromfield Alexander Shameer Hassan	JN wire transfer to NJ in Jamaica	\$1,450
Thirteen	6/15/2013	Nadine Bromfield Alexander Shameer Hassan	JN wire transfer to CL in Jamaica	\$1,430
Fourteen	7/13/2013	Treysier Mikael LaPalme	Western Union wire transfer to HH in Jamaica	\$730
Fifteen	8/22/2013	Robert Blake Madurie Shameer Hassan	JN wire transfer to DA in Jamaica	\$500
Sixteen	12/21/2013	Robert Blake Madurie Shameer Hassan	JN wire transfer to CH in Jamaica	\$690
Seventeen	12/21/2013	Oral Anthony Stewart Shameer Hassan	JN wire transfer to NW in Jamaica	\$480
Eighteen	1/9/2014	Oral Anthony Stewart Shameer Hassan	JN wire transfer to DR in Jamaica	\$760
Nineteen	2/5/2014	Danny Lopez Shameer Hassan	JN wire transfer to SS in Jamaica	\$950
Twenty	2/22/2014	Treysier Mikael LaPalme	Western Union wire transfer to EE in Jamaica	\$720
Twenty-One	4/18/2014	Robert Blake Madurie Shameer Hassan	JN wire transfer to MDS in Jamaica	\$720
Twenty-Two	5/21/2014	Robert Blake Madurie Danny Lopez	Cash withdrawal from Wells Fargo bank account ending # 9102	\$5,700

In violation of 18 U.S.C. § 1956(a)(1)(B)(i) and 18 U.S.C. § 2.

COUNTS TWENTY-THREE THROUGH TWENTY-FIVE
(Aggravated Identity Theft)

17. On or about the dates listed below, in the Middle District of Florida, and elsewhere, the defendants,

ROBERT BLAKE MADURIE
NADINE BROMFIELD ALEXANDER
SHAMEER HASSAN

together with others known and unknown to the Grand Jury, did knowingly transfer, possess and use, without lawful authority, a means of identification of the actual persons listed below, during and in relation to a felony violation of 18 U.S.C. § 1349, as charged in Count One of this Indictment, knowing that such means of identification belonged to an actual person:

Count	Victim	Date	Description
Twenty-Three	M.R.	8/22/2013	Name, address and driver's license number for JN wire transfer
Twenty-Four	R.H.	9/20/2013	Name, address and driver's license number for JN wire transfer
Twenty-Five	J.C.	4/18/2014	Name, address and driver's license number for JN wire transfer

In violation of 18 U.S.C. § 1028A(a)(1) and (b) and 18 U.S.C. § 2.

FORFEITURE

1. The allegations contained in Counts One through Twenty-Two of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1349, or any violation of 18 U.S.C. § 1343, the defendants shall forfeit to the United States of America, 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. Upon conviction of a violation of 18 U.S.C. § 1956, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in such offense, or any property traceable to such property.

4. The property to be forfeited includes, but is not limited to, the following: a money judgment in the amount of \$3.6 million dollars.

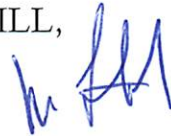
5. If any of the property described above, as a result of any act or omission of the defendants:

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;
- e. has been commingled with other property which cannot be divided without difficulty;


the United States of America, shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c).

A TRUE BILL,




Foreperson

MARIA CHAPA LOPEZ
United States Attorney

By: 

Karen L. Gable
Assistant United States Attorney

By: 

Roger B. Handberg
Assistant United States Attorney
Chief, Orlando Division

UNITED STATES DISTRICT COURT
Middle District of Florida
Orlando Division

THE UNITED STATES OF AMERICA

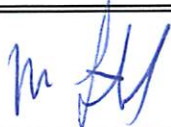
vs.

ROBERT BLAKE MADURIE
TREYSIER MIKAEL LAPALME
ORAL ANTHONY STEWART
DANNY LOPEZ
NADINE BROMFIELD ALEXANDER
SHAMEER HASSAN

INDICTMENT

Violations: 18 U.S.C. §§ 1349, 1343, 1956(h)
and (a)(1), and 1028A(a)(1)

A true bill,



Foreperson

Filed in open court this 30th day
of May 2018.



Clerk

Bail \$ _____
