

FILED

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION  
MAR 14 AM 11:34  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO, FLORIDA

UNITED STATES OF AMERICA

v. CASE NO. 6:18-cr-52-01-37DET  
18 U.S.C. § 1341  
ROHAN BROWN 18 U.S.C. § 1343  
18 U.S.C. § 1029(a)(3)  
18 U.S.C. § 1028A(a)(1)

**INDICTMENT**

The Grand Jury charges:

**COUNTS ONE THROUGH THREE**  
**(Mail Fraud)**

**A. The Scheme and Artifice**

1. Beginning at a time unknown to the Grand Jury, but beginning at least by in or about January 2015, and continuing thereafter through and including on or about August 29, 2016, in the Middle District of Florida, and elsewhere, the defendant,

ROHAN BROWN,

did knowingly, willfully, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises relating to material facts, which scheme and artifice is described below.

**B. Manner and Means of the Scheme and Artifice**

2. The substance of the scheme and artifice, and the manner and means used to accomplish its ends, included, among others, the following:

3. It was part of the scheme and artifice that ROHAN BROWN and others known and unknown to the Grand Jury would and did contact victims, including elderly individuals, in the United States and falsely tell them that they had won a sweepstakes, but to receive their winnings, they first had to send a payment through the United States mail to ROHAN BROWN.

4. It was further part of the scheme and artifice that ROHAN BROWN and others known and unknown to the Grand Jury would and did instruct the victims to send the payment to ROHAN BROWN's address or another address to which ROHAN BROWN had access.

5. It was further part of the scheme and artifice that ROHAN BROWN would and did receive payments from the victims in the United States mail.

6. It was further part of the scheme and artifice that ROHAN BROWN would and did send a portion of the fraudulently obtained money to others in Jamaica.

**C. Executions of the Scheme and Artifice**

7. On or about the dates set forth below in each count, in the Middle District of Florida, and elsewhere, the defendant,

**ROHAN BROWN,**

for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, did knowingly, willfully, and with intent to defraud cause to be delivered by the United States Postal Service and by a private and commercial interstate carrier, according to the directions thereon, the following matters and things:

<b>Count</b>	<b>Date</b>	<b>Description of Mailing</b>
One	Between January 8, 2015 and January 12, 2015	Parcel sent by L.H. in North Dakota to ROHAN BROWN in Orlando, Florida.
Two	February 1, 2016	Parcel sent by M.H. in Illinois to ROHAN BROWN in Orlando, Florida.
Three	February 8, 2016	Parcel sent by W.S. in Colorado to ROHAN BROWN in Altamonte Springs, Florida.

All in violation of 18 U.S.C. §§ 1341 and 2.

**COUNTS FOUR THROUGH SEVEN**  
**(Wire Fraud)**

**A. The Scheme and Artifice**

8. Beginning at a time unknown to the Grand Jury, but beginning at least by in or about March 2014, and continuing thereafter through and including on or about August 29, 2016, in the Middle District of Florida, and elsewhere, the defendant,

**ROHAN BROWN,**

did knowingly, willfully, and with intent to defraud, devise and intend to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations and promises relating to material facts, which scheme and artifice is described below.

**B. Manner and Means of the Scheme and Artifice**

9. The substance of the scheme and artifice, and the manner and means used to accomplish its ends, included, among others, the following:

10. It was part of the scheme and artifice that ROHAN BROWN and others known and unknown to the Grand Jury would and did obtain personal identifying information from elderly victims and others over the telephone or through some other source unknown to the Grand Jury.

11. It was further part of the scheme and artifice that ROHAN BROWN and others known and unknown to the Grand Jury would and did use the fraudulently obtained personal identifying information to divert Social Security benefits into a bank account or prepaid debit card account fraudulently opened in the name of victim, but using ROHAN BROWN's address or another address to which he had access.

12. It was further part of the scheme and artifice that ROHAN BROWN and others known and unknown to the Grand Jury would and did

cause access devices for the fraudulent accounts to be sent to ROHAN BROWN at his address or to another address to which he had access.

13. It was further part of the scheme and artifice that ROHAN BROWN would and did use the access devices, including to purchase money orders, some of which were sent to others in Jamaica.

14. It was further part of the scheme and artifice that ROHAN BROWN would and did deposit some of those money orders into a bank account in his name.

**C. Executions of the Scheme and Artifice**

15. On or about the dates set forth below in each count, in the Middle District of Florida, and elsewhere, the defendant,

ROHAN BROWN,

for the purpose of executing the aforesaid scheme and artifice, and attempting to do so, did knowingly, willfully, and with intent to defraud transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, the following writings, signs, signals, pictures, and sounds:

<b>Count</b>	<b>Date</b>	<b>Description of Wire</b>
Four	March 16, 2014	Interstate wire communication from Chase Bank to Meta Bank for a \$223 ATM withdrawal
Five	May 2, 2014	Interstate wire communication from Publix Supermarket to Meta Bank for a \$780 purchase
Six	December 4, 2014	Interstate wire communication from Publix Supermarket to Meta Bank for a \$170 money order
Seven	July 31, 2015	Interstate wire communication from Publix Supermarket to Wells Fargo Bank for a \$500 money order

All in violation of 18 U.S.C. §§ 1343 and 2.

**COUNT EIGHT**  
**(Aggravated Identity Theft)**

16. On or about July 31, 2015, in the Middle District of Florida, and elsewhere, the defendant,

ROHAN BROWN,

did knowingly possess and use, without lawful authority, a means of identification of another person, specifically, the name of J.M., during and in relation to a felony violation of wire fraud, in violation of 18 U.S.C. § 1343, as charged in Count Seven of this Indictment, knowing that such means of identification belonged to an actual person.

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

**COUNT NINE**  
**(Access Device Fraud)**

17. On or about August 29, 2016, in the Middle District of Florida, and elsewhere, the defendant,

ROHAN BROWN,

did knowingly and with intent to defraud possess 15 or more counterfeit and unauthorized access devices, as defined in 18 U.S.C. § 1029(e), that is, debit cards, credit cards, account numbers, personal identification numbers, and other means of account access that could be used to obtain money, goods, services, and any other thing of value, and that could be used to initiate a transfer of funds, and the offense affected interstate commerce.

In violation of 18 U.S.C. § 1029(a)(3) and (c)(1)(A)(i).

**COUNT TEN**  
**(Aggravated Identity Theft)**

18. On or about August 29, 2016, in the Middle District of Florida, and elsewhere, the defendant,

ROHAN BROWN,

did knowingly possess, without lawful authority, a means of identification of another person, specifically, the Social Security number and date of birth of J.B., during and in relation to a felony violation of access device fraud, in violation of 18 U.S.C. § 1029(a)(3) and (c)(1)(A)(i), as charged in Count Nine

of this Indictment, knowing that such means of identification belonged to an actual person.

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

**FORFEITURE**

1. The allegations contained in Counts One through Seven and Count Nine are incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of 18 U.S.C. §§ 981(a)(1)(C), 982(a)(2)(B) and 1029(c)(1)(C) and 28 U.S.C. § 2461(c).

2. Upon conviction of a violation of 18 U.S.C. § 1029, the defendant shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds the person obtained directly or indirectly, as a result of such violation, and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit the offense.

3. Upon conviction of a violation of 18 U.S.C. §§ 1341 or 1343, the defendant shall forfeit to the United States, 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 violation.

4. If any of the property described above, 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;
- e. has been commingled with other property which cannot be divided without difficulty;

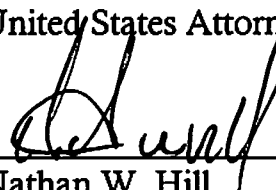
the United States shall be entitled to forfeiture of substitute property under the provisions of 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. §§ 982(b)(1) and 1029(c)(2) and 28 U.S.C. § 2461(c).

A TRUE BILL,


  
Foreperson

MARIA CHAPA LOPEZ  
United States Attorney

By:

  
Nathan W. Hill  
Assistant United States Attorney

By:

  
Katherine M. Ho  
Assistant United States Attorney  
Chief, Orlando Division

**UNITED STATES DISTRICT COURT**  
Middle District of Florida  
Orlando Division

**THE UNITED STATES OF AMERICA**

vs.

**ROHAN BROWN**

**INDICTMENT**

Violation:

- 18 U.S.C. § 1341
- 18 U.S.C. § 1343
- 18 U.S.C. § 1029(a)(3)
- 18 U.S.C. § 1028A(a)(1)

A true bill,



Foreperson

Filed in open court this 14th day  
of March, 2018.



Clerk

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