

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
MAURICE SIMMONDS a/k/a "Damion Dash"	:	VIOLATIONS: 18 U.S.C. § 1349 (conspiracy to commit
DEVON A. GRANT a/k/a "The Bachelor"	:	mail, wire and bank fraud - 1 count) 18 U.S.C. § 1343 (wire fraud – 12 counts)
MAJID MORRIS	:	18 U.S.C. § 2314 (travel fraud – 4 counts)
ASHLEY HICKS-WILLIAMS	:	18 U.S.C. § 2 (aiding and abetting)
MELISSA DUNCAN	:	Notice of Forfeiture
WARREN CHEVANNES a/k/a "Dave"	:	

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

INTRODUCTION

1. Defendant MAURICE SIMMONDS devised a plan to defraud elderly and other individuals who would be susceptible to being scammed by convincing the individuals that they had won the "Jamaican lottery" and needed to pay him and others monies, by cash, check and debit and credit cards, in order to receive their lottery winnings.

2. Defendant MAURICE SIMMONDS had a connection with a corporate or federal government employee who provided him with "lead lists" that contained the names, addresses, telephone numbers and other biographical information of individuals, whom

defendant SIMMONDS targeted as part of his plan and telephoned them to falsely represent that they had won the “Jamaican lottery.”

3. Defendant MAURICE SIMMONDS’ targets (hereinafter, “victims”) included: L.A., a resident of Cowen, Tennessee suffering from diminished mental capacity; N.D., a resident of Drexel Hill, Pennsylvania suffering from progressively diminishing mental capacity; J.A., a resident of New York, New York; and M.W., a resident of New York, New York.

4. Defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope, charged elsewhere, obtained cash, checks, debit and credit cards, and property from the victims based on the false representation that the victims needed to pay fees and provide services and property before they could receive their lottery winnings.

5. Defendants MAJID MORRIS, ASHLEY HICKS-WILLIAMS, MELISSA DUNCAN and WARREN CHEVANNES, with knowledge of the “Jamaican lottery” scam, engaged in activities to obtain additional monies from the victims and to transfer monies obtained through the scam.

THE CONSPIRACY AND SCHEME TO DEFRAUD

6. Beginning in or about January 2012 and continuing until in or about March 2015, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MAURICE SIMMONDS
a/k/a “Damion Dash”
DEVON A. GRANT
a/k/a “The Bachelor”
MAJID MORRIS
ASHLEY HICKS-WILLIAMS
MELISSA DUNCAN and
WARREN CHEVANNES
a/k/a “Dave”**

knowingly and intentionally conspired and agreed with each other and others to devise a scheme to defraud elderly and other individuals who would be susceptible to being scammed, and to obtain money and property from these victims and financial institutions by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing and attempting to execute the scheme and artifice to defraud, knowingly caused to be delivered by mail certain parcels containing money, and caused to be transmitted by means of wire and radio communication in interstate commerce, certain writings, signs, signals, pictures and sounds associated with monetary transactions, in violation of 18 U.S.C. §§ 1341, 1343 and 1344.

OBJECT OF THE CONSPIRACY AND SCHEME TO DEFRAUD

7. The object of the conspiracy and scheme to defraud was to obtain money from senior citizens and others by falsely telling them they had won the “Jamaican lottery.”

MANNER AND MEANS OF THE CONSPIRACY AND SCHEME TO DEFRAUD

8. It was part of the conspiracy that defendant MAURICE SIMMONDS devised a plan to obtain identification information belonging to elderly individuals and to defraud some of those individuals by convincing them that they had won monies from the “Jamaican lottery” and needed to pay him and others fees in order to collect their lottery winnings.

It was further part of the conspiracy that:

9. Defendant MAURICE SIMMONDS obtained “lead lists,” which contained the names, addresses, telephone number and other biographical information of individuals from either a corporate or federal government employee and targeted elderly and other individuals whom he believed would be susceptible to being scammed, whose information

appeared on the lists.

10. Defendant MAURICE SIMMONDS telephoned L.A., N.D., J.A., M.W. and others and told them that they had won the “Jamaican lottery” and were required to pay fees in order to receive the lottery winnings.

11. Defendants MAURICE SIMMONDS and DEVON GRANT and Javon Cope frequently traveled from New York to Pennsylvania to obtain cash, checks, and debit and credit cards belonging to N.D.

12. Defendant MAURICE SIMMONDS and Javon Cope cashed checks received from N.D. and used N.D.’s American Express credit card to purchase goods and services in New York.

13. Defendant MAURICE SIMMONDS instructed L.A. and others to contact N.D.’s banks, to pretend to be N.D., and to determine the account balances.

14. Defendant MAURICE SIMMONDS and Javon Cope caused N.D. to write checks payable to L.A. Defendant SIMMONDS and Cope mailed the checks to L.A., instructed L.A. to deposit the checks into her bank account, write checks payable to defendant SIMMONDS with the proceeds of the checks she received, and mail L.A.’s checks to defendant SIMMONDS.

15. Defendant MAURICE SIMMONDS and Javon Cope obtained cash from N.D., caused wire transfers of the monies to L.A., and instructed L.A. to write checks payable to defendant SIMMONDS with the proceeds of the wire transfers she received.

16. Defendants MAURICE SIMMONDS, MAJID MORRIS and ASHLEY HICKS-WILLIAMS created a fraudulent Pennsylvania driver’s license with defendant HICKS-WILLIAMS photograph and N.D.’s name and biographical information and attempted to use the

identification document to withdraw \$375,000 or more from N.D.'s Franklin Mint Federal Credit Union ("FMFCU") account.

17. Defendant MELISSA DUNCAN provided Javon Cope with instructions on how to purchase multiple Green Dot Moneybags with N.D.'s debit/credit card and use the Moneybags to obtain cash.

18. Defendant MELISSA DUNCAN sent wire transfers of money for Javon Cope from the Walmart store in Valley Stream, New York where she worked. Defendant DUNCAN's husband, defendant WARREN CHEVANNES, collected fees from Javon Cope for those wire transfers of monies which he and defendant DUNCAN believed were proceeds from the "Jamaican lottery" scam.

19. Defendants MAURICE SIMMONDS and WARREN CHEVANNES telephoned L.A. and coerced L.A. to mail them cash and a blank check as part of the "Jamaican lottery" scam.

20. Defendant MAURICE SIMMOND and Javon Cope obtained money and property from J.A.

21. Defendant MAURICE SIMMONDS attempted to obtain \$10,000 from M.W.

22. Defendant MAURICE SIMMONDS obtained and attempted to use M.W.'s American Express credit card to purchase goods and services in New York.

23. Defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope, as the result of their fraudulent actions, caused and attempted to cause the banks and credit card companies of the victims to electronically transmit data pursuant to check deposits and debit and credit card transactions.

24. Defendants MAURICE SIMMONDS, DEVON A. GRANT, MAJID MORRIS, ASHLEY HICKS-WILLIAMS, MELISSA DUNCAN, and WARREN CHEVANNES and Javon Cope, as the result of the fraudulent actions, collected a total of more than \$200,000 from the victims, which they converted to their personal use and used to promote their ongoing fraudulent scheme, attempted to collect additional monies, and did not disburse any lottery winnings to any of the victims.

OVERT ACTS

In furtherance of the conspiracy and to affect its object, the following overt acts were committed in the Eastern District of Pennsylvania and elsewhere:

1. On or about January 7, 2012, defendant MAURICE SIMMONDS telephoned N.D. and convinced her that she had won \$3 million from the “Jamaican lottery” and needed to provide him with cash or a check to cover fees in order to recover her winnings.
2. On or about January 7, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained a \$2,000 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.
3. On or about March 2, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained a \$5,000 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.
4. On or about March 5, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained \$1,000 and \$4,000 FMFCU checks from N.D., transported the checks from Pennsylvania to New York, and cashed the checks.

5. On or about March 30, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained a \$6,000 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.

6. On or about April 4, 2012, defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope obtained at least \$2,900 cash from N.D.

7. On or about April 4, 2012, defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope caused the wire transmission of \$2,900 obtained from N.D. from East Norriton, Pennsylvania to L.A. in Tennessee.

8. On or about July 11, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained a \$6,500 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.

9. On or about December 29, 2012, defendant MAURICE SIMMONDS and Javon Cope obtained a \$3,000 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.

10. On or about May 21, 2013, defendant MAURICE SIMMONDS telephoned J.A. and convinced him/her that he/she had won money from the "Jamaican lottery" and needed to provide him with cash or a check to cover fees in order to recover his/her winnings.

11. On or about a date between May 21, 2013 and September 11, 2013, defendant MAURICE SIMMONDS and Javon Cope convinced J.A. to provide them with \$10,940.61 in cash and property, including two T-Mobile cellular telephones, a laptop computer, and a television.

12. On or about August 2, 2013, defendant MAURICE SIMMONDS and Javon Cope obtained a \$1,000 FMFCU check from N.D., transported the check from Pennsylvania to New York, and cashed the check.

13. On or about September 11, 2013, defendant MAURICE SIMMONDS contacted J.A. and instructed him/her that defendant DEVON A. GRANT would pick him/her up and transport him/her from New York to Pennsylvania to pick up some money.

14. On or about September 11, 2013, defendant DEVON A. GRANT transported J.A. on a round trip from New York to Pennsylvania for the purpose of picking up an envelope containing \$2,000 cash from N.D. Defendant GRANT took possession of the envelope and transported the monies from Pennsylvania to New York.

15. On or about November 16, 2013, defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope obtained cash or a check and N.D.'s FMFCU debit/credit card from N.D. and transported the cash or check and property from Pennsylvania to New York.

16. On or about December 1, 2013, defendant MELISSA DUNCAN instructed Javon Cope that he could purchase as much as \$10,000 in Green Dot Moneybags in one day with N.D.'s FMFCU debit/credit card and could take the Moneybags to any ATM and make cash withdrawals.

17. On or about December 1, 2013, defendant MELISSA DUNCAN assisted defendant MAURICE SIMMONDS and Javon Cope in purchasing at least two Green Dot Moneybags, one for \$1,004.64 and another for \$984.64 with N.D.'s FMFCU debit/credit card.

18. On or about December 2, 2013, defendant MAURICE SIMMONDS and Javon Cope caused L.A. or another individual, from a telephone number used by L.A., to make a

number of calls to TD Bank, falsely state that they were N.D., they were stuck in New York, needed money, and wanted to know the balance in N.D.'s TD Bank account(s).

19. On or about December 2, 2013, defendant MAURICE SIMMONDS instructed Javon Cope to open a bank account at TD Bank. Javon Cope deposited N.D.'s TD Bank check in the amount of \$2,000 into the newly opened TD Bank account.

20. On or about December 30, 2013, defendant MAURICE SIMMONDS and Javon Cope used N.D.'s American Express card to purchase \$3,000 in goods and services in New York.

21. On or about December 8, 2014, defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope traveled from New York to N.D.'s home in Drexel Hill, Pennsylvania. Defendant SIMMONDS stole N.D.'s wallet, Pennsylvania driver's license, a Macy's credit card, a VISA debit card, and a MasterCard from N.D.'s handbag and transported N.D.'s property from Pennsylvania to New York.

22. On or about December 6, 2014, defendant MAURICE SIMMONDS telephoned M.W. and told M.W. that he/she had won monies in the "Jamaican lottery" and needed to provide defendant SIMMONDS with \$10,000.

23. On or about December 16, 2014, defendant MAURICE SIMMONDS obtained M.W.'s American Express card and made two attempts to make fraudulent purchases of goods and services with M.W.'s American Express card.

24. In or about January 2015, defendant MAURICE SIMMONDS recruited defendants MAJID MORRIS and ASHLEY HICKS-WILLIAMS to create a fraudulent Pennsylvania driver's license with defendant HICKS-WILLIAMS' photograph and N.D.'s biographical information to make withdrawals from N.D.'s bank account(s).

25. On or about February 1, 2015, defendant MAJID MORRIS downloaded a software program from the internet and created a fraudulent Pennsylvania driver's license to be used by defendant ASHLEY HICKS-WILLIAMS to make withdrawals from N.D.'s bank account(s).

26. On or about February 3, 2015, defendants MAURICE SIMMONDS and MAJID MORRIS and Javon Cope traveled from New York to Broomall, Pennsylvania, where they were met defendant ASHLEY HICKS-WILLIAMS at a FMFCU bank branch.

27. On or about February 3, 2015, defendant ASHLEY HICKS-WILLIAMS and Javon Cope entered the FMFCU bank branch in Broomall, Pennsylvania, where defendant HICKS-WILLIAMS produced the fraudulently made Pennsylvania driver's license in N.D.'s name, requested a withdrawal of \$375,000, then corrected herself and stated, "I will take however much I can withdraw" from N.D.'s FMFCU savings account.

28. On or about January 30, 2015, defendant MELISSA DUNCAN engaged in the wire transmission of \$4,000 that she believed was part of the "Jamaican lottery" scam for Javon Cope.

29. On or about January 30, 2015, defendant WARREN CHEVANNES requested a fee of \$500 for the wire transmissions made by defendant MELISSA DUNCAN that he believed was part of the "Jamaican lottery" scam.

30. On or about February 23, 2015, defendant WARREN CHEVANNES provided Javon Cope with a New York identification document to use when he performed the next wire transmission. Later, Cope provided defendant MELISSA DUNCAN with the New York identification document and \$8,000 that he represented was part of the "Jamaican lottery" scam that he wanted to wire to an individual. Defendant DUNCAN instructed Cope to make up

nine numbers for a Social Security Number to use on wire transmission documents and defendant DUNCAN subsequently wired the money given to her by Cope.

31. On or about February 23, 2015, defendant WARREN CHEVANNES collected \$500 from Javon Cope for the wire transmissions made by defendant MELISSA DUNCAN.

32. On or about March 20, 2015, defendants MAURICE SIMMONDS and WARREN CHEVANNES engaged in telephone calls with L.A. and instructed her to mail each of them packages; defendant SIMMONDS requested \$10,000 and defendant CHEVANNES requested \$10,000 and a blank check from L.A.

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

COUNTS TWO THROUGH TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 24 of Count One are realleged and incorporated herein by reference.

THE WIRE FRAUD SCHEME

2. Beginning in or about January 2012 and continuing through in or about March 2015, defendants

**MAURICE SIMMONDS
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DEVON A. GRANT
a/k/a “The Bachelor”
MAJID MORRIS
ASHLEY HICKS-WILLIAMS
MELISSA DUNCAN and
WARREN CHEVANNES
a/k/a “Dave”**

aided and abetted by each other, devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and knowingly joined in the scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

3. It was part of the scheme that defendants MAURICE SIMMONDS, and DEVON A. GRANT and Javon Cope falsely convinced elderly and other individuals that they had won the “Jamaican lottery” and that they would need to pay fees to receive their lottery winnings.

4. It was further part of the scheme that defendants and, instead, endeavored to use the biographical and financial information of the elderly and other individuals to access

and take possession of their financial resources without providing them with the purported lottery winnings.

5. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendant

**MAURICE SIMMONDS
a/k/a "Damion Dash,"**

aided and abetted by Javon Cope and others known and unknown to the grand jury, and for the purpose of executing and attempting to execute the scheme, knowingly caused to be transmitted in interstate commerce, certain writings, signs, signals, pictures and sounds, that is, wire communications for the electronic transfer of monies from N.D.'s bank accounts in the Eastern District of Pennsylvania to various locations in New York:

COUNT	DATE	BANK	AMOUNT
2	1/7/2012	FMFCU	\$2,000
3	3/2/2012	FMFCU	\$5,000
4	3/5/2012	FMFCU	\$1,000
5	3/5/2012	FMFCU	\$4,000
6	3/30/2012	FMFCU	\$6,000
7	7/11/2012	FMFCU	\$6,500
8	12/29/2012	FMFCU	\$3,000
9	8/2/2013	FMFCU	\$1,000
10	12/2/2013	TD Bank	\$2,000

All in violation of Title 18, United States Code, Section 1343.

COUNTS ELEVEN THROUGH TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 24 of Count One, and paragraphs 2 through 4 of Counts 2-10, are realleged and incorporated herein by reference.
2. On or about the following dates, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MAURICE SIMMONDS
a/k/a "Damion Dash" and
MELISSA DUNCAN**

aided and abetted by Javon Cope and others known and unknown to the grand jury, and for the purpose of executing and attempting to execute the scheme, knowingly caused to be transmitted in interstate commerce, certain writings, signs, signals, pictures and sounds, that is, wire communications for the electronic transfer of monies from N.D.'s bank account in the Eastern District of Pennsylvania to Valley Stream, New York and elsewhere:

COUNT	DATE	BANK	AMOUNT
11	12/1/2013	FMFCU	\$1004.64
12	12/1/2013	FMFCU	\$984.64

All in violation of Title 18, United States Code, Section 1343.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 24 of Count One, and paragraphs 2 through 4 of Counts 2-10, are realleged and incorporated herein by reference.
2. On or about the following date, in the Eastern District of Pennsylvania, and elsewhere, defendants

**MAURICE SIMMONDS
a/k/a "Damion Dash" and
DEVON A. GRANT
a/k/a "The Bachelor"**

aided and abetted by Javon Cope and others known and unknown to the grand jury, and for the purpose of executing and attempting to execute the scheme, knowingly caused to be transmitted in interstate commerce, certain writings, signs, signals, pictures and sounds, that is, wire communications for the electronic transfer of monies via MoneyGram from the Eastern District of Pennsylvania to Cowen, Tennessee:

COUNT	DATE	AMOUNT
13	4/4/2012	\$2,900

All in violation of Title 18, United States Code, Section 1343.

COUNTS FOURTEEN THROUGH SEVENTEEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 24 of Count One are realleged and incorporated herein by reference.

THE TRAVEL FRAUD SCHEME

2. Beginning in or about January 2012 and continuing through in or about March 2015, defendants

**MAURICE SIMMONDS
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DEVON A. GRANT
a/k/a "The Bachelor"
MAJID MORRIS
ASHLEY HICKS-WILLIAMS
MELISSA DUNCAN and
WARREN CHEVANNES
a/k/a "Dave"**

aided and abetted by each other, and Javon Cope, devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises, and knowingly joined in the scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations and promises.

MANNER AND MEANS

3. It was part of the scheme that defendants MAURICE SIMMONDS and DEVON A. GRANT and Javon Cope falsely convinced elderly and other individuals that they had won the "Jamaican lottery" and that they would need to pay fees to receive their lottery winnings.

4. It was further part of the scheme that defendant MAURICE SIMMONDS and Javon Cope, instead, endeavored to use the biographical and financial information of the

elderly and other individuals to access and take possession of their financial resources without providing them with the purported lottery winnings.

5. On or about each of the dates reflected below for each of Counts Fourteen through Seventeen, within the Eastern District of Pennsylvania, and elsewhere, defendant

MAURICE SIMMONDS
a/k/a "Damion Dash,"

aided and abetted by Javon Cope and others known and unknown to the grand jury, and for the purpose of executing and attempting to execute the scheme, transported and caused to be transported in interstate commerce, from Pennsylvania to New York, FMFCU checks made payable to "L.A." and "Javon Cope" by N.D., with a total value of \$5,000 or more, knowing such checks were obtained by fraud:

COUNT	DATE	AMOUNT
14	3/2/2012	\$5,000
15	3/5/2012	\$5,000
16	3/30/2012	\$6,000
17	7/11/2012	\$6,500

All in violation of Title 18, United States Code, Section 2314.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 1341, 1343, 1344, 1349 and 2314, as set forth in this indictment, defendants

**MAURICE SIMMONDS
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DEVON A. GRANT
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MAJID MORRIS
ASHLEY HICKS-WILLIAMS
MELISSA DUNCAN and
WARREN CHEVANNES
a/k/a "Dave"**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to, the sum of more than \$200,000.

2. If any of the property subject to forfeiture, 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; or
- (e) has been commingled with other property which cannot be divided without difficulty;

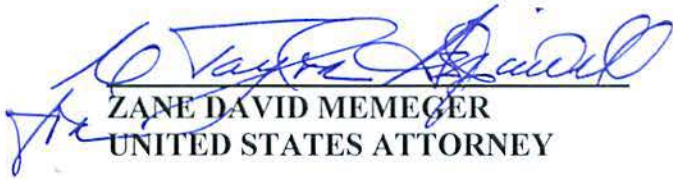
it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b) and Title 28, United States Code, Section 2461(c), both incorporating Title 21, United States Code,

Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

All pursuant to Title 28, United States Code, Section 2461(c) and Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY