

ATTACHMENT A

Count One
(Conspiracy to Transport Stolen Vehicles)

From at least in or around May 2011, through at least in or around December 2011, in Essex, Union and Hudson Counties, in the District of New Jersey and elsewhere, the defendants,

RONALD BENNETT,
a/k/a "Fat Man,"
a/k/a "Cash,"
SHANTEL BENNETT,
a/k/a "Shantel Thomas,"
ALMAHDEE JEFFERSON,
a/k/a "Marty,"
ADDO OBENG,
a/k/a "Foster,"
ABUBAKAR ALHASSAN,
a/k/a "Abou,"
and
WILSON NWAEJIAKU,
a/k/a "John,"

did conspire to transport in interstate and foreign commerce motor vehicles, knowing the same to have been stolen, contrary to Title 18, United States Code, Section 2312.

In violation of Title 18, United States Code, Section 371.

Count Two
(Transportation of Stolen Vehicles)

In or around August 2011, in Essex and Union Counties, in the District of New Jersey and elsewhere, the defendants,

RONALD BENNETT,
a/k/a "Fat Man,"
a/k/a "Cash,"
and
ADDO OBENG,
a/k/a "Foster,"

did transport in interstate and foreign commerce a 2009 Mercedes Benz, model ML350, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

Count Three
(Transportation of Stolen Vehicles)

From at least in or around September 2011 through at least in or around December 2011, in Essex and Union Counties, in the District of New Jersey and elsewhere, the defendants,

ADDO OBENG,
a/k/a "Foster,"
and
ABUBAKAR ALHASSAN,
a/k/a "Abou,"

did transport in interstate and foreign commerce a 2009 BMW, model 750 and a 2011 Land Rover Range Rover knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

Count Four
(Transportation of Stolen Vehicles)

From at least in or around September 2011 through at least in or around December 2011, in Essex and Union Counties, in the District of New Jersey and elsewhere, the defendants,

SHANTEL BENNETT,
a/k/a "Shantel Thomas,"
ALMAHDEE JEFFERSON,
a/k/a "Marty,"
ADDO OBENG,
a/k/a "Foster,"
and
ABUBAKAR ALHASSAN,
a/k/a "Abou,"

did transport in interstate and foreign commerce a 2007 Toyota RAV 4, knowing the same to have been stolen.

In violation of Title 18, United States Code, Section 2312 and Section 2.

ATTACHMENT B

I, Sean C. Larmon, am a Special Agent with Immigration and Customs Enforcement, Homeland Security Investigations (“HSI”), assigned to the Newark Division. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and items of evidence. Where statements of others are related herein, they are related in substance and part. Because this complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

OBJECT AND OVERVIEW OF THE CONSPIRACY TO TRAFFIC STOLEN VEHICLES

1. The investigation has revealed that numerous stolen vehicles have been illegally exported, or attempted to be exported, from the seaports in Newark and Elizabeth, New Jersey, to various destinations overseas, including to Nigeria, Ghana, Guinea, Sierra Leone and Gambia, among other countries. These vehicles were either stolen or carjacked in various states, including in New Jersey. The overseas market for stolen and carjacked vehicles is growing because customers can purchase those vehicles at a cost significantly lower than the true market value of the vehicles.

2. To fill this growing demand, the Defendants (identified below) have joined a criminal organization that involves the theft, carjacking, sale, receipt, transportation, interstate trafficking and illegal exportation of stolen and sometimes altered motor vehicles and motor vehicle parts. This organization is wide and extensive and generally operates in multiple layers, as follows:

a. One layer of the auto-theft exportation organization includes the individuals who steal motor vehicles. In some instances, the motor vehicles are carjacked. The theft and carjacking of vehicles is usually done by individuals who are gang members or who are otherwise affiliated with a gang.

b. A second layer of the auto-theft exportation organization involves individuals who sell and purchase stolen or carjacked vehicles. Those vehicles are typically sold to a fence, *i.e.*, someone who purchases the stolen vehicles for just a few thousand dollars, even if the vehicle is a brand new luxury vehicle worth tens of thousands of dollars. A fence typically employs “runners,” *i.e.*, individuals who drive the stolen and carjacked vehicles from one location to another to avoid detection of the vehicles by law enforcement and who collect payments from sales of the vehicles.

c. A third layer of the auto-theft exportation organization involves individuals who “retag” the vehicles after they are stolen or carjacked. The process of “retagging” involves altering the Vehicle Identification Number (“VIN”), that is, the unique serial number used by the automotive industry to identify individual motor vehicles. In some instances, the “new” VIN is fictitious. In other instances, the VIN is a duplicate of an existing VIN that was not designed or manufactured for the stolen or carjacked vehicle. Part of the re-tagging typically takes place in parking lots, in garages and even on the streets. In addition to altering the VIN on stolen or carjacked vehicles, the members of the organization may obtain a counterfeit Certificate of Title for stolen vehicles to match the new or fictitious VIN. A Certificate of Title is a document for a motor vehicle issued by a state, describing the vehicle by year, make, model, color and VIN, as well as listing the name and address of the owner and/or

lienholder (financial institution that loaned money to buy the car). In some instances cars are retagged before export and in some instances they are not.

d. After a stolen or carjacked vehicle has been retagged, the fourth layer of the criminal activity involves the sale of the vehicle to a customer. The “customers” in this case are either individual exporters who purchase the vehicles for their personal use in the United States or overseas, or individuals who ship stolen and carjacked vehicles from the United States to other countries to resell them to end-users. In some instances, the customers place orders, that is, they tell fences that they are looking to buy specific vehicles. In other instances, individuals who steal or carjack vehicles contact the fences and let them know the type of vehicles available for sale.

e. A fifth layer of criminal activity involves individuals who coordinate the exportation of stolen vehicles overseas. Vehicles are shipped abroad through a Non-Vessel Operating Common Carrier (“NVOCC”). An NVOCC is a company licensed by the Federal Maritime Commission (“FMC”) that is bonded and insured for purposes of exporting goods in foreign commerce. Individual persons or entities who are not licensed with the FMC obtain the services of NVOCCs to ship goods overseas. The NVOCC leases containers and guarantees space on vessels being operated by major shipping carriers who will only do business with entities who are bonded and insured. The NVOCC does not take physical custody of the goods or containers. Instead, they process documents required by Customs and the shipping carriers who actually ship the goods in foreign commerce, such as a Shipper’s Export Declaration, bill of lading and dock receipts. Because NVOCCs require documentation from persons shipping vehicles, customers typically use a middle person to conduct the transaction in an attempt to insulate themselves. Alternatively, customers present fraudulent documentation to

conceal the true information about the vehicles being exported overseas, such as altered Certificates of Title.

OVERVIEW OF THE DEFENDANTS

3. **RONALD BENNETT**, a/k/a “Fat Man,” a/k/a “Cash,” is a large-scale fence, that is, someone who buys stolen/carjacked vehicles from street gang members and other individuals and then resells them at a higher price to persons who export those stolen/carjacked vehicles overseas. **RONALD BENNETT** receives stolen and carjacked vehicles from various street gang members. **RONALD BENNETT** is also a middleman between the street gang members and “connects.” A “connect” is someone who is a middleman between a fence and customers looking to export vehicles overseas. At times, **RONALD BENNETT** puts in an order for particular vehicles, while at other times he is called and told what vehicles are available for **BENNETT** to sell to his “connects.”

4. **SHANTEL BENNETT**, a/k/a “Shantel Thomas,” is **RONALD BENNETT**’s wife. For a time period while **RONALD BENNETT** was incarcerated on several charges, including carjacking, **SHANTEL BENNETT** continued the business for her husband.

5. **ALMAHDEE JEFFERSON**, a/k/a “Marty” is an associate of **RONALD BENNETT** and **SHANTEL BENNETT**. He is also a “runner,” *i.e.*, an individual who drives stolen vehicles from one location to another to avoid detection of the vehicles. **ALMAHDEE JEFFERSON** also sells stolen and carjacked vehicles.

6. **ADDO OBENG**, a/k/a “Foster,” is an exporter of stolen and carjacked vehicles. He purchases stolen and carjacked vehicles from fences, including **RONALD BENNETT** and exports them overseas from Port Newark/Elizabeth to customers in Africa.

7. **ABUBAKAR ALHASSAN**, a/k/a “Abou,” is an associate of ADDO OBENG and WILSON NWAJEIAKU. He is also a middleman who arranges for exporters to meet with connects and purchase stolen vehicles for export overseas.

8. **WILSON NWAJEIAKU**, a/k/a “John,” is an associate of ABUBAKAR ALHASSAN and a customer of RONALD BENNETT, HOPE KANTETE and MANUEL DE JESUS OLIVARES. WILSON purchases stolen vehicles from fences, including RONALD BENNETT, HOPE KANTETE and MANUEL DE JESUS OLIVARES and exports stolen vehicles overseas.

9. **HOPE KANTETE**, a/k/a “the Lady,” who is charged in a separate complaint, is a large-scale fence, that is, someone with an extensive customer base who buys stolen/carjacked vehicles not only from street gang members and other individuals but also from other fences like MANUEL DE JESUS OLIVARES. HOPE KANTETE resells those vehicles at a higher price, and she facilitates the exportation of stolen/carjacked vehicles overseas for her customers.

10. **MANUEL DE JESUS OLIVARES**, like HOPE KANTETE, is a fence. In addition, MANUEL DE JESUS OLIVARES, who is charged in a separate complaint, retags stolen vehicles, that is, alters the vehicle identification number of stolen vehicles to make them appear legitimate for purposes of selling them domestically and facilitating the export of those vehicles from the United States to various destinations overseas.

THE CONSPIRACY CONDUCT

Confidential Source

11. Confidential Source ("CS") is an individual who was engaged in the illegal export of stolen vehicles. CS disclosed to law enforcement that he/she has known **RONALD BENNETT**, a/k/a "Fat Man," a/k/a "Cash," since approximately 2011, but has known of him for much longer. He/she knows that RONALD BENNETT is in the business of buying and selling stolen/carjacked vehicles, and reselling those vehicles to exporters who ship the cars overseas. He/she has personally assisted RONALD BENNETT in selling stolen vehicles to customers to be shipped overseas.

12. CS also disclosed to law enforcement that he/she has known **ABUBAKAR ALHASSAN**, a/k/a "Abou," since approximately 2010. He/she knows that ABUBAKAR ALHASSAN is a middleman who arranges for exporters to meet with connects and purchase stolen vehicles for export overseas.

13. CS also disclosed to law enforcement that he/she has known **ADDO OBENG**, a/k/a "Foster," since approximately 2009. He/she knows that ADDO OBENG, a/k/a "Foster," is in the business of buying and selling stolen and carjacked vehicles and shipping those vehicles. He/she has personally engaged in transactions with ADDO OBENG, a/k/a "Foster" to ship stolen and carjacked vehicles abroad.

14. CS has also engaged in transactions with certain defendants, as partially detailed below.

Initial Warehouse Meeting with RONALD BENNETT

15. On or about May 26, 2011, defendant RONALD BENNETT and the CS met at a Warehouse in New Jersey, which was being operated by CS and was equipped with

video surveillance (the "Warehouse"). The purpose of the meeting was to show the Warehouse to BENNETT so that he could potentially store vehicles there and so that the two could arrange for the sale of stolen vehicles to the CS's connects. The CS showed the Warehouse to BENNETT, indicating where he/she would be placing the shipping containers in which cars would be loaded for export. At that time BENNETT informed the CS that he had a BMW 750, a Mercedes S550 and two Range Rovers, but that the S550 was already gone. BENNETT offered to sell the other three vehicles. He stated that he could provide both of the Range Rovers to the CS for \$4500 each.

Sale of Cars to Defendant NWAEJIAKU for Export

Sale of Stolen 2011 Toyota RAV 4 from Olivares to NWAEJIAKU

16. On or about June 7, 2011, the CS met with defendant ABUBAKAR ALHASSAN, a/k/a "Abou," in Newark, New Jersey for the purpose of introducing the CS to defendant WILSON NWAEJIAKU, a/k/a "John." Defendant NWAEJIAKU was engaged in shipping stolen cars abroad and wanted to purchase stolen vehicles from or through the CS. At that time, defendant NWAEJIAKU provided his cell phone number to the CS to facilitate later sales of stolen cars.

17. On or about June 17, 2011, the CS and defendant NWAEJIAKU met at the Warehouse. Defendant NWAEJIAKU and the CS traveled in separate vehicles to Jersey City, Hudson County, to meet with Manual de Jesus Olivares (hereinafter "Olivares"), who is charged in a separate complaint. The purpose of the meeting was for defendant NWAEJIAKU to purchase stolen vehicles from Olivares. At that time, Olivares had two vehicles available, a 2011 Toyota RAV 4 for \$7000 and a BMW X3 for \$12,200. On the same date, law enforcement intercepted a telephone conversation between ALHASSAN and the CS. ALHASSAN stated,

“He stated he can do sixty-five, alright?” Defendant NWAEJIAKU arranged to have defendant ALHASSAN pay Olivares for the 2011 Toyota RAV 4 the following day.

18. While the CS and defendant NWAEJIAKU were with Olivares, Hope Kantete, who is charged in a separate complaint, arrived at the location and offered to purchase the BMW X3 from Olivares to sell to defendant NWAEJIAKU for \$7,700. Kantete, who had previously done a lot of business with defendant NWAEJIAKU, wanted additional business from NWAEJIAKU and was willing to take a loss on the car to gain his business back. Later that day, defendant NWAEJIAKU gave money to defendant ALHASSAN to purchase the stolen RAV 4 from Olivares. That same day, Defendant NWAEJIAKU told the CS that he was looking to purchase GL450's, X6's and E350's.

19. On or about June 20, 2011, the CS and defendant ALHASSAN met with Olivares to pick up the 2011 Toyota Rav 4 and deliver it to the Warehouse. At that time, defendant ALHASSAN paid Olivares \$6500, which he had received from defendant NWAEJIAKU, for the 2011 Toyota RAV 4. After paying for the vehicle, the CS and defendant ALHASSAN brought the car back to the Warehouse. Two days later, law enforcement entered the Warehouse and confirmed that the 2011 Toyota RAV 4 had been stolen out of Union City, Hudson County on or about June 14, 2011.

Sale of Stolen 2006 Land Rover from BENNETT to NWAEJIAKU

20. On or about June 22, 2011, defendant BENNETT, defendant NWAEJIAKU and the CS met at the Warehouse to arrange for the sale of a 2006 Land Rover. Defendant BENNETT left the Warehouse to pick up the car and returned driving the 2006 Land Rover Range Rover into the Warehouse. Defendant NWAEJIAKU provided defendant BENNETT with \$3200 for the purchase of the 2006 Land Rover. According to the CS,

Defendant NWAEJIAKU was to give defendant BENNETT an additional \$2000 - \$1500 to retag the vehicle and \$500 for a false certificate of title. On that same day, law enforcement confirmed that the 2006 Land Rover in the Warehouse had been stolen out of Hoboken, New Jersey on June 18, 2011.

21. On or about June 23, 2011, defendant NWAEJIAKU met with the CS at the Warehouse to further inspect the 2006 Land Rover and the 2011 Toyota RAV4 that he had purchased from defendant BENNETT and Olivares, respectively. Defendant NWAEJIAKU complained that the altered VIN on the Toyota RAV 4 did not match the VIN number on the title documentation that he received. Because a shipping container ordinarily holds three cars, defendant NWAEJIAKU left both cars in the Warehouse, until he could obtain a third car to fill a container to ship them all abroad at the same time.

22. On or about June 29, 2011, defendant BENNETT took the 2006 Land Rover from the Warehouse to retag it. When defendant NWAEJIAKU failed to pay the additional \$2000, BENNETT did not return with the vehicle.

Facts Related to Container GCNU465461-4 for ADDO OBENG

Sale of Stolen 2009 Mercedes ML350 TAN from BENNETT to OBENG

23. On or about August 1, 2011, the CS received a phone call from defendant RONALD BENNETT over a cellular telephone that was being consensually monitored and recorded by Homeland Security Investigations. During that call, BENNETT informed the CS that he had two vehicles for sale, an "ML and the Q7." [referring to a Mercedes ML 350 and an Audi Q7].

24. On or about August 3, 2011, the CS placed a call to defendant ADDO OBENG, a/k/a "Foster." The CS informed OBENG that he had a seller [defendant BENNETT]

who could sell the ML 350 and the Q7. Defendant OBENG asked, "They got good prices?" The CS proceeded to call defendant BENNETT to inquire as to the prices. BENNETT informed the CS, "I could do seven five for both" [meaning \$7500 for the sale of both cars].

25. The CS called defendant OBENG and informed him of the price. The CS also stated, "I can even box it up" [meaning that he could arrange to get the container for the shipment of the cars out of the United States.] Over the course of the day, multiple consensually recorded phone calls were made and received between the CS and BENNETT and the CS and OBENG, in which the sale of the vehicles was negotiated and arranged. During a call at 1:46 pm, the CS told BENNETT, "I'm going to be doing the shipping for him . . . He's gonna take both of them." BENNETT stated: "I don't know if I'm still gonna have it in the morning. . . It might be gone."

26. On or about August 4, 2011, the CS arranged to meet with defendants BENNETT and OBENG to facilitate the sale of the ML 350 at the Warehouse. Because at the time defendant OBENG had only partial payment for the cars, defendant BENNETT told the CS: "Tell him to take one now . . . and then when he bring me the balance, you take the other one." When defendant OBENG arrived at the Warehouse, the CS called defendant BENNETT, who asked the CS: "Bring, bring which one man?" The CS replied: "Bring the MD. Defendant BENNETT then stated, "It ain't no MD, it's a ML. Benz." The CS told BENNETT: "That's what I mean. Merceds Benz. MD. ML. Bring that one first."

27. The same day, at approximately 5:00 p.m, law enforcement observed defendant OBENG arrive at the Warehouse in a white pickup truck. Thereafter, at approximately 5:54 p.m, law enforcement observed defendant BENNETT arrive at the Warehouse driving a tan Mercedes ML 350 and pull the vehicle inside of the Warehouse. A

black Dodge Charger, bearing New Jersey license plate F48ABD, parked in front of the Warehouse and waited for BENNETT.

28. While inside the Warehouse, defendant OBENG counted out the money for the car and paid the money over to defendant BENNETT. Several minutes later, law enforcement observed BENNETT leave the Warehouse, enter the Dodge Charger and leave the location. Thereafter, law enforcement observed defendant OBENG exit the Warehouse and leave the location in his white pickup truck.

29. On August 5, 2011, law enforcement confirmed that the 2009 Tan Mercedes ML350 that was in the Warehouse had been stolen on August 1, 2011 out of West Orange, New Jersey.

30. On August 8, 2011, defendant OBENG met with the CS at the Warehouse to retrieve the stolen Mercedes ML 350 for shipment out of the country. While in the Warehouse, defendant OBENG removed the license plate from the vehicle and left it inside the Warehouse. Thereafter law enforcement observed defendant OBENG drive the stolen ML 350 from the Warehouse to a fenced in location at M&M Scrap Metal in Elizabeth, New Jersey, across from SGF Freight. The ML 350 was later located in a container for shipment to Africa.

Inspection of Container GCNU465461-4

31. On August 16, 2011, law enforcement officers with Customs and Border Protection inspected container GCNU465461-4 that had been delivered to the Redhook Terminal in Brooklyn, New York for purposes of export to Tema, Ghana. Therein, law enforcement located three stolen vehicles, including the 2009 Mercedes ML350 referenced in paragraph 30 above. Law enforcement confirmed that the 3 vehicles within that container were stolen in New Jersey:

| DESCRIPTION OF STOLEN VEHICLE | DATE OF THEFT |
|-------------------------------|-----------------------------------|
| a. 2009 Tan Mercedes ML350 | August 1, 2011 West Orange, NJ |
| b. 2009 White Toyota Corolla | July 26, 2011 Roseland, NJ |
| c. 2011 Black Acura RDX | July 26, 2011 Roseland, NJ |

32. Law enforcement learned that the booking for the container containing the above vehicles was arranged by “Cassandra Container Lines.” Cassandra Container Lines is a Non-Vessel Operating Common Carrier (“NVOCC”), as described above in paragraph 2e.

33. Law enforcement reviewed documents submitted in connection with the shipments of these three stolen vehicles. A review of those documents revealed that a company doing business as “Faithful International Shipping LLC” was the shipper. The company is located at 1139 East Jersey Street Suite 203 in Elizabeth New Jersey. “Faithful International Shipping LLC” is not licensed with the Federal Maritime Commission, which requires companies to obtain certain licenses in order to ship goods overseas.

34. The dock receipt from the items being shipped falsely stated that the container consisted of a Chevy Cavalier, a Nissan and personal effects.

35. Investigation revealed that the three cars in Container GCNU465461-4 were being shipped to Tema, Ghana by defendant OBENG. Defendant OBENG later informed the CS that the three cars arrived there safely and that he had sold the ML350 for \$30,000.

Armed Theft of Jeep Grand Cherokee SRT8 by Defendant RONALD BENNETT

36. On or about August 17, 2011, a 2007 black Jeep Grand Cherokee SRT8 was taken from D.W. and G.S. in Newark, Essex County, New Jersey. The victims were dropping off/picking up vehicles from an auto transporter when they were approached by a black

male with a firearm. The black male then entered the car and fled with it. A white Cadillac with tinted windows fled behind the vehicle.

37. At or about 4:42 p.m. that same day, defendant RONALD BENNETT met with the CS on the street to discuss the sale of a Land Rover. BENNETT arrived at the meeting place, the corner of Murray Street and Broad Street, in a black Jeep Grand Cherokee SRT-8 with no plates. BENNETT exited the driver's side of the vehicle and the passenger slid over. BENNETT informed the CS that he was unable to transport a Land Rover to the Warehouse as planned because law enforcement was "sitting on the car." BENNETT then returned to the driver's side of the Jeep and drove it away.

38. The victims of the carjacking tracked the carjacked Jeep into Irvington, Essex County, New Jersey using a lojack tracking device. The victim notified law enforcement, who detained three male suspects who were with the vehicle: defendant RONALD BENNETT, defendant ALMAHDEE JEFFERSON and another individual, U.Y. Defendant RONALD BENNETT was later identified as the individual who had done the carjacking and arrested for the same.

Facts Related to Container PONU806314-5 for ADDO OBENG

Recovery of the Carjacked Car from the Security Guard

39. On September 19, 2011, a 2011 blue Jaguar XF was taken from G.A. at gunpoint in Newark, Essex County, New Jersey. The victim was driving when his car was boxed in by a white four door BMW. A black male then approached the car with a silver handgun and stated: "Get out of the car [expletive]!" The black male then entered the Jaguar car and fled with it. Three additional unidentified men were in the white BMW, which followed the carjacked Jaguar from the scene.

40. On September 21, 2011, Hillside Police Department recovered the carjacked Jaguar from K.P., an employee of SGF Freight.

Delivery of Two Stolen Mercedes to the Warehouse for Defendant OBENG

41. On or about September 27, 2011, two Mercedes Benz arrived at the Warehouse driven by two individuals for defendant ADDO OBENG. Later the same day, law enforcement confirmed that both vehicles had been stolen, one from Elizabeth, New Jersey on September 17, 2011 and one from Manalapan, New Jersey on September 27, 2011.

Cars Relocated for Defendant OBENG from SGF Freight

42. On or about October 5, 2011, the CS met with defendant ALHASSAN at the Warehouse. Defendant ALHASSAN spoke with the CS regarding three shipping containers to Tema, Ghana. He also asked the CS if he could arrange to have two vehicles towed from SGF Freight to the CS' Warehouse due to the recent recovery of the Jaguar and the arrest of the SGF Freight employee, K.P. Defendant ALHASSAN indicated that defendant OBENG would pay \$1,500 for the use of the Warehouse and additional money for a tow truck driver to tow the two cars from SGF Freight to the Warehouse for export to Tema, Ghana.

43. On or about October 14, 2011, defendant OBENG and another individual met with the CS at the Warehouse. At that time, defendant OBENG inspected certain stolen vehicles stored at the Warehouse. Around the same time, Defendant OBENG spoke with the CS about moving the two cars from SGF Freight to the Warehouse following the recovery of the carjacked Jaguar. Defendant OBENG explained, in substance and in part, that he had a stolen vehicle recovered by police at a shipping storage facility, SGF Freight, located in Elizabeth, New Jersey. OBENG did not trust storing vehicles there and wanted to move the two remaining cars

to the CS' Warehouse. The two vehicles were transported to the Warehouse on October 24 and 26, 2011 as set forth below.

44. On or about October 24, 2011, a tow truck arrived at the Warehouse transporting a 2009 Green BMW 750, which was picked up at SGF Freight in Elizabeth, New Jersey at the request of defendant OBENG. A database inquiry revealed that the 2009 Green BMW 750 was stolen on or about September 14, 2011 from Englewood Cliffs, New Jersey. This vehicle was one of the stolen vehicles loaded onto Container ZCSU702655-8 for defendant OBENG. This same vehicle was later identified by law enforcement during the inspection of Container UACU551176-2, referenced in paragraph 59 below.

45. On or about October 26, 2011, a tow truck arrived at the Warehouse transporting a 2011 Black Land Rover Range Rover, which had been picked up at SGF Freight in Elizabeth, New Jersey at the request of defendant OBENG. A database inquiry revealed that the 2011 Black Land Rover Range Rover, was stolen on or about September 8, 2011 from Mendham, New Jersey. This vehicle was one of the stolen vehicles loaded onto Container ZCSU702655-8 for defendant OBENG, referenced in paragraph 59 below. This same vehicle was later identified by law enforcement during the inspection of Container UACU551176-2.

46. On or about October 26, 2011, defendant OBENG provided the CS with \$1800 as partial payment for shipping fees and instructions from defendant OBENG for the shipment of the three vehicles, listed in paragraph 47 below, to Tema, Ghana.

Loading of Container PONU806314-5

47. On October 31, 2011, at the direction of defendant OBENG, container PONU806314-5 was loaded at the Warehouse with the following three stolen vehicles for export to Tema, Ghana:

| DESCRIPTION OF STOLEN VEHICLE | DATE OF THEFT |
|-------------------------------|--|
| 1. 2010 Red Mercedes GL450 | September 27, 2011 Manalapan, NJ |
| 2. 2010 White Mercedes E350 | September 17, 2011 Elizabeth, NJ |
| 3. 2009 Green BMW 750 | September 14, 2011 Englewood Cliffs, NJ |

Shipment of Container PONU806314-5

48. On November 1, 2011, Container PONU806314-5 was gated into APM Terminal for export from Port Elizabeth, New Jersey to Tema, Ghana on board the vessel Maersk Westertal, voyage sail date on November 7, 2011.

49. On or about November 7, 2011, Container PONU806314-5 was shipped from Port Elizabeth, New Jersey to Tema, Ghana and arrived in Tema, Ghana on December 9, 2011.

50. On or about February 14, 2012, defendant OBENG provided the CS with an additional \$4200 as the remaining payment for shipping the three cars in Container PONU806314-5 to Tema, Ghana.

Facts Related to Containers ZCSU702655-8 and UACU551176-2 for ADDO OBENG

Sale of 2007 Toyota Rav 4 from SHANTEL BENNETT to ADDO OBENG

51. Following defendant RONALD BENNETT's arrest, defendant SHANTEL BENNETT, a/k/a "Shantel Thomas," defendant BENNETT's wife (hereinafter defendant "SHANTEL BENNETT") contacted the CS and offered to sell him cars. On or about August 20, 2011, defendant SHANTEL BENNETT contacted the CS and stated: "Hey, how you doing? This is . . . Fat Man's wife. . . . He wanted [to] know, go through his boy because they got some stuff or whatever. But he can't talk to you personally because he's locked up." Later that same day, defendant SHANTEL BENNETT asked the CS, "He [defendant BENNETT] was saying, do you mind dealing with me?" At approximately 4:40 p.m., defendant SHANTEL BENNETT called the CS again and offered to sell him/her a "black on black S63 2010" for \$7000.

52. On or about September 9, 2011, defendant SHANTEL BENNETT sent a text to the CS indicating "I got a white 09 fx and a blk 2011 acura tsx." In a phone call later that day, defendant SHANTEL BENNETT offered to sell both of those vehicles to the CS for \$6000. That same day and into the following day, defendant SHANTEL BENNETT sent the CS multiple text messages in which she indicated, "I got some more shit.!"

53. On or about September 27, 2011, at approximately 12:09 p.m., the CS received an incoming call from defendant SHANTEL BENNETT. At that time, defendant RONALD BENNETT was still being detained pending charges in connection with the carjacking of the Jeep Grand Cherokee.

54. Defendant SHANTEL BENNETT informed the CS that: "They got a 2011 . . . Toyota Rav 4." The CS inquired as to the asking price for the car. Defendant SHANTEL BENNETT indicated that she would have to inquire. The CS and defendant SHANTEL

BENNETT exchanged multiple calls in which they agreed on the price of \$2500.

55. At approximately 7:34 pm on September 27, 2011, law enforcement observed defendant ALHASSAN arrive at the Warehouse on foot and meet with the CS. At approximately 8:15 pm, another individual arrived at the Warehouse in a Gray 2007 Toyota RAV 4. Immediately thereafter, defendant ALMAHDEE JEFFERSON arrived at the Warehouse in the same black Dodge Charger as had waited at the Warehouse for defendant BENNETT, on August 4, 2011 referenced in paragraph 27. Defendant ALHASSAN paid defendant JEFFERSON \$3,000 from defendant OBENG for the purchase of the Toyota RAV 4.

56. On or about September 28, 2011, the CS received a text from defendant ALMAHDEE JEFFERSON, which stated: "She just told me u found out that . . . was 2007! Not cool at all! That type of [expletive] makes me look bad! U got MY WORD anything I get from anybody else ill check myself!!"

57. On October 18, 2011, law enforcement identified the 2007 Gray Toyota RAV 4 that was as stolen out of Newark, Essex County, New Jersey on September 25, 2011.

Stolen Honda Accord Brought to the Warehouse by Defendant OBENG

58. On November 1, 2011 law enforcement observed defendant OBENG and another individual deliver a 2009 Black Honda Accord to the Warehouse. A law enforcement check of the 2009 Black Honda Accord revealed that it was stolen out of Hillside, New Jersey on October 2, 2011.

Loading of Container ZCSU702655-8 and Inspection of Container UACU551176-2

59. On December 20, 2011, at the direction of defendant OBENG, the CS loaded container ZCSU702655-8 with three vehicles:

| DESCRIPTION OF STOLEN VEHICLE | DATE OF THEFT |
|-------------------------------|----------------------------------|
| 1. 2007 Gray Toyota Rav 4 | September 25, 2011 Newark, NJ |
| 2. 2011 Black Land Rover | September 8, 2011 Mendham, NJ |
| 3. 2009 Black Honda Accord | October 2, 2011 Hillside, NJ |

60. On December 21, 2011, Container ZCSU702655-8 was delivered to a secure parking facility under the direction of defendant OBENG for shipment to Tema, Ghana. Investigation revealed that Container ZCSU702655-8 missed the shipping cut off date and that the three cars therein were later removed and reloaded onto Container UACU551176-2, which was discharged in Algeciras, Spain awaiting shipment to Tema, Ghana.

61. Container UACU551176-2 was rerouted back to the United States. Upon redelivery of Container UACU551176-2, law enforcement opened up Container UACU551176-2 and found therein the three stolen cars listed in the table above in paragraph 59.