

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

DANIEL SIKKEMA,
a/k/a “Daniel Garcia Carrera,”

Defendant.

SEALED SUPERSEDING INDICTMENT

S1 24 Cr. 227 (ER)

OVERVIEW

1. In or about 2023, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, and another individual (“CC-1”), agreed that SIKKEMA would pay CC-1 to kill SIKKEMA’s estranged husband (“Victim-1”) in Brazil. At that time, SIKKEMA and Victim-1 were engaged in contentious divorce proceedings. Victim-1, a United States citizen, had amassed a multi-million-dollar estate, traveled to Brazil regularly, and owned a townhouse in Rio de Janeiro, Brazil.

2. Between in or about mid-2023 through in or about January 2024, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, a United States and Cuban citizen, sent multiple payments to CC-1 and to CC-1’s romantic partner in Cuba (“Individual-1”), including from Manhattan where SIKKEMA was living at the time, in order to facilitate CC-1’s commission of the murder. SIKKEMA concealed the source of each of these payments by using either a stolen identity or an intermediary to send the payment.

3. In the early morning hours on or about January 14, 2024, CC-1 snuck into Victim-1’s townhouse in Rio de Janeiro, Brazil. CC-1 stabbed Victim-1, who was inside of the residence, multiple times. Victim-1 was later found dead in the residence.

4. In the days that followed, CC-1 and DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, communicated on several occasions, including through a Brazilian phone number that CC-1 had set up specifically for SIKKEMA at SIKKEMA’s direction (the “Brazilian Number”). SIKKEMA arranged for a payment of approximately \$5,000 to be made to CC-1, through Individual-1, and promised to make an additional payment to CC-1, through Individual-1, at a later date.

5. On or about January 18, 2024, CC-1 was arrested in Brazil by Brazilian law enforcement for his commission of Victim-1’s murder.

COUNT ONE
(Murder-for-Hire Conspiracy Resulting in Death)

The Grand Jury charges:

6. The allegations contained in paragraphs 1 through 5 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

7. From at least in or about 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to travel in and cause another person to travel in interstate and foreign commerce, and to use and cause another person to use the mail and a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of any State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in the death of another person, to wit, SIKKEMA and CC-1 agreed with each other that CC-1 would

kill Victim-1 in exchange for money and used facilities of interstate and foreign commerce to carry out the plan, which resulted in the murder of Victim-1 on or about January 14, 2024 in Brazil.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT TWO
(Murder-for-Hire Resulting in Death)

The Grand Jury further charges:

8. The allegations contained in paragraphs 1 through 5 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

9. From at least in or about 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, traveled in and caused another person to travel in interstate and foreign commerce, and used and caused another person to use the mail and a facility of interstate and foreign commerce, with intent that a murder be committed in violation of the laws of any State and the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, which resulted in the death of another person, and aided and abetted the same, to wit, SIKKEMA agreed to pay CC-1 money to kill SIKKEMA’s estranged husband, Victim-1, and used and caused another person to use the facilities of interstate and foreign commerce to carry out the plan, which resulted in the murder of Victim-1 on or about January 14, 2024 in Brazil.

(Title 18, United States Code, Sections 1958 and 2.)

COUNT THREE
(Conspiracy to Murder and Maim a Person in a Foreign Country)

The Grand Jury further charges:

10. The allegations contained in paragraphs 1 through 5 of this Superseding Indictment

are repeated and realleged as if fully set forth herein.

11. From at least in or about 2023 through at least in or about January 2024, in the Southern District of New York and elsewhere, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, within the jurisdiction of the United States, and others known and unknown, knowingly and intentionally combined, conspired, confederated, and agreed together and with each other, to commit, at a place outside the United States, acts that would constitute the offenses of murder and maiming if committed in the special maritime and territorial jurisdiction of the United States, to wit, SIKKEMA, while in the United States, and CC-1 agreed with each other that SIKKEMA would pay CC-1 to kill Victim-1, while Victim-1 was in Brazil.

Overt Acts

12. In furtherance of the conspiracy and to effect the illegal object thereof, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, committed the following overt acts within the jurisdiction of the United States, among others:

- a. On or about July 31, 2023, SIKKEMA asked an individual (“Individual-2”) to send a wire transfer of approximately \$400 on his behalf to CC-1.
- b. On or about August 13, 2023, SIKKEMA asked an individual (“Individual-3”) to send a wire transfer of approximately \$1,200 on his behalf to CC-1.
- c. On or about August 23, 2023, SIKKEMA asked Individual-3 to send a wire transfer of approximately \$300 on his behalf to CC-1.
- d. On or about August 28, 2023, SIKKEMA sent an electronic message to CC-1 in which he asked CC-1, in sum and substance, to buy and set up the phone line for the Brazilian Phone for SIKKEMA.

e. On or about August 31, 2023, SIKKEMA created an account on a messaging application using the Brazilian Phone, which SIKKEMA and CC-1 used to communicate before and after Victim-1's murder.

f. In or about September 18, 2023, SIKKEMA asked an individual ("Individual-4") to send a wire transfer of approximately \$600 on his behalf to CC-1.

g. From at least on or about October 13, 2023 until at least on or about January 5, 2024, SIKKEMA, using a stolen identity, sent CC-1 wire transfers amounting to approximately \$2,700.

h. On or about January 15, 2024, the day after the murder of Victim-1, SIKKEMA contacted an individual by phone ("Individual-5") to ask Individual-5 to give approximately \$5,000 to CC-1, through Individual-1.

(Title 18, United States Code, Section 956(a)(1), (a)(2)(A).)

COUNT FOUR
(Passport Fraud)

The Grand Jury further charges:

13. On or about February 8, 2024, in the Southern District of New York and elsewhere, DANIEL SIKKEMA, a/k/a "Daniel Garcia Carrera," the defendant, willfully and knowingly made a false statement in an application for a passport with intent to induce and secure the issuance of a passport under the authority of the United States, for his own use and the use of another, contrary to the laws regulating the issuance of passports and the rules prescribed pursuant to such laws, and used and attempted to use, and furnished to another for use a passport the issue of which was secured by reason of a false statement, to wit, SIKKEMA submitted an application for a passport for his son ("Minor Child-1"), in which he stated that Minor Child-1's passport book was lost, while knowing that statement to be false.

(Title 18, United States Code, Sections 1542 and 2.)

FORFEITURE ALLEGATION

14. As a result of committing the offenses alleged in Counts One, Two, and Three of this Superseding Indictment, DANIEL SIKKEMA, a/k/a “Daniel Garcia Carrera,” the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

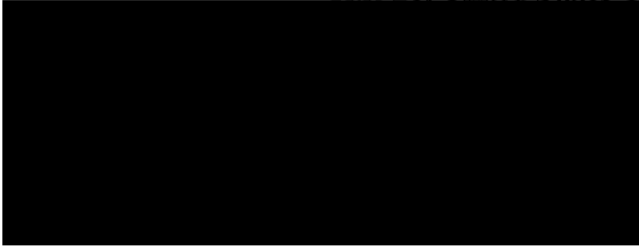
Substitute Assets Provision

15. If any of the above-described forfeitable property, 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 person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



A handwritten signature in cursive script, appearing to read 'D. Sassoon'.

DANIELLE R. SASSOON
United States Attorney