

AL:MEG/RTP
F. #2016R00370

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

RICHARD ALMAREZ,
also known as "Rated R,"
BONNAY BENFORD,
also known as "Popalot,"
MARQUEZ BRIDGES,
also known as "Tega,"
TERRELL BROWN,
also known as "Rellz,"
TISLAM CATO,
also known as "Vietnam,"
MICAH ISAIAH DESUZE,
SHAHEEM EVANS,
also known as "Sha,"
JOSEPH ISAR RAS,
also known as "Bada Boom,"
ELVIN SANABRIA,
also known as "Rico,"
JEREMY SANCHEZ,
also known as "Jermz,"
ASHANTI SEASE-MATTHEWS and
OMAR JERMAINE WALKER,

Defendants.

- - - - - X

THE GRAND JURY CHARGES:

SUPERSEDING
INDICTMENT

Cr. No. 16-326 (S-3) (ARR)
(T. 18, U.S.C., §§ 371, 922(a)(6), 924(a)(2),
924(d), 2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

U.S. DISTRICT COURT
EASTERN DISTRICT
OF NEW YORK

2017 FEB 23 PM 4:00

FILED
CLERK

COUNT ONE
(Conspiracy to Deal in Firearms)

1. In or about and between October 2015 and June 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants RICHARD ALMAREZ, also known as "Rated R," BONNAY BENFORD, also known as "Popalot," MARQUEZ BRIDGES, also known as "Tega," TERRELL BROWN, also known as "Rellz," TISLAM CATO, also known as "Vietnam," MICAH ISAIAH DESUZE, SHAHEEM EVANS, also known as "Sha," JOSEPH ISAR RAS, also known as "Bada Boom," ELVIN SANABRIA, also known as "Rico," JEREMY SANCHEZ, also known as "Jermz," ASHANTI SEASE-MATTHEWS and OMAR JERMAINE WALKER, together with others, did knowingly and willfully conspire to engage in the business of dealing in firearms without being a licensed dealer, and in the course of such business ship, transport, and receive firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Sections 922(a)(1)(A) and 924(a)(1)(D).

2. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendants RICHARD ALMAREZ, also known as "Rated R," BONNAY BENFORD, also known as "Popalot," MARQUEZ BRIDGES, also known as "Tega," TERRELL BROWN, also known as "Rellz," TISLAM CATO, also known as "Vietnam," MICAH ISAIAH DESUZE, SHAHEEM EVANS, also known as "Sha," JOSEPH ISAR RAS, also known as "Bada Boom," ELVIN SANABRIA, also known as "Rico," JEREMY SANCHEZ, also known as "Jermz," ASHANTI

SEASE-MATTHEWS and OMAR JERMAINE WALKER, together with others, did commit and cause to be committed, among others, the following:

OVERT ACTS

- a. On or about October 3, 2015, coconspirator Dominique Chanel Fairnot purchased one firearm from a licensed dealer and falsely affirmed on a Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF") Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;
- b. On or about October 3, 2015 and October 4, 2015, SANCHEZ purchased one firearm from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearm when in fact he was purchasing the firearm on behalf of another person;
- c. On or about October 17, 2015 and October 18, 2015, SANCHEZ purchased six firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;
- d. On or about November 22, 2015, DESUZE purchased six firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;
- e. On or about November 28, 2015, DESUZE purchased eight firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the

actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;

f. On or about November 29, 2015, WALKER purchased eleven firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;

g. On or about December 6, 2015, and December 10, 2015, SANCHEZ purchased three firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;

h. On or about December 10, 2015, SEASE-MATTHEWS purchased five firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

i. On or about December 13, 2015, SEASE-MATTHEWS purchased four firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

j. On or about December 13, 2015, SANCHEZ purchased three firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that he was the actual buyer of the firearms when in fact he was purchasing the firearms on behalf of another person;

k. On or about December 19, 2015, SEASE-MATTHEWS purchased six firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

l. On or about December 19, 2015, Fairnot purchased three firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

m. On or about January 17, 2016, SEASE-MATTHEWS purchased three firearms from a licensed dealer and falsely affirmed on ATF Forms 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

n. On or about January 17, 2016, SEASE-MATTHEWS purchased four firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person;

o. On or about January 20, 2016, SEASE-MATTHEWS purchased three firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person; and

p. On or about February 6, 2016, SEASE-MATTHEWS purchased three firearms from a licensed dealer and falsely affirmed on an ATF Form 4473 that she was

the actual buyer of the firearms when in fact she was purchasing the firearms on behalf of another person.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO

(Conspiracy to Make False Statements to Acquire Firearms)

3. In or about and between October 2015 and June 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants BONNAY BENFORD, also known as "Popalot," MARQUEZ BRIDGES, also known as "Tega," MICAH ISAAH DESUZE, JEREMY SANCHEZ, also known as "Jermz," ASHANTI SEASE-MATTHEWS and OMAR JERMAINE WALKER, together with others, did knowingly and willfully conspire to (a) in connection with the acquisition and attempted acquisition of firearms from licensed dealers, make one or more false and fictitious oral and written statements and furnish and exhibit one or more false and fictitious and misrepresented identifications, with the intent and likelihood to deceive such dealers with respect to facts material to the lawfulness of the sales of such firearms under Chapter 44 of Title 18 of the United States Code, contrary to Title 18, United States Code, Sections 922(a)(6) and 924(a)(2); and (b) make one or more false statements and representations with respect to information required by Chapter 44 of Title 18 of the United States Code to be kept in the records of firearms dealers licensed under Chapter 44 of Title 18 of the United States Code, contrary to Title 18, United States Code, Section 924(a)(1)(A).

4. In furtherance of the conspiracy and to effect its objectives, within the Eastern District of New York and elsewhere, the defendants BONNAY BENFORD, also

known as "Popalot," MARQUEZ BRIDGES, also known as "Tega," MICAH ISAIAH DESUZE, JEREMY SANCHEZ, also known as "Jermz," ASHANTI SEASE-MATTHEWS and OMAR JERMAINE WALKER, together with others, did commit and cause to be committed, among others, the overt acts set forth in paragraphs 2(a) through 2(p) of Count One of this Superseding Indictment, which are realleged and incorporated as if fully set forth in this paragraph.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNTS THREE THROUGH SIXTEEN
(Making False Statements to Acquire Firearms)

5. On or about the dates set forth below, within the Northern District of Georgia, the defendants set forth below, together with others, did knowingly and intentionally make one or more false and fictitious oral and written statements in connection with the acquisition and attempted acquisition of one or more firearms from a licensed dealer, which statements were intended and likely to deceive such dealer with respect to one or more facts material to the lawfulness of the sales of such firearms under Chapter 44 of Title 18 of the United States Code:

<u>COUNT</u>	<u>DATE</u>	<u>DEFENDANT</u>
THREE	OCTOBER 3, 2015	SANCHEZ
FOUR	OCTOBER 17, 2015	SANCHEZ
FIVE	NOVEMBER 22, 2015	DESUZE

SIX	NOVEMBER 28, 2015	DESUZE
SEVEN	NOVEMBER 29, 2015	WALKER
EIGHT	DECEMBER 10, 2015	SEASE-MATTHEWS
NINE	DECEMBER 10, 2015	SANCHEZ
TEN	DECEMBER 13, 2015	SEASE-MATTHEWS
ELEVEN	DECEMBER 13, 2015	SANCHEZ
TWELVE	DECEMBER 19, 2015	SEASE-MATTHEWS
THIRTEEN	JANUARY 17, 2016	SEASE-MATTHEWS
FOURTEEN	JANUARY 17, 2016	SEASE-MATTHEWS
FIFTEEN	JANUARY 20, 2016	SEASE-MATTHEWS
SIXTEEN	FEBRUARY 6, 2016	SEASE-MATTHEWS

(Title 18, United States Code, Sections 922(a)(6), 924(a)(2), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

6. The United States hereby gives notice to the defendants RICHARD ALMAREZ, also known as “Rated R,” BONNAY BENFORD, also known as “Popalot,” MARQUEZ BRIDGES, also known as “Tega,” TERRELL BROWN, also known as “Rellz,” TISLAM CATO, also known as “Vietnam,” MICAH ISAIAH DESUZE, SHAHEEM EVANS, also known as “Sha,” JOSEPH ISAR RAS, also known as “Bada Boom,” ELVIN

SANABRIA, also known as "Rico," JEREMY SANCHEZ, also known as "Jermz," ASHANTI SEASE-MATTHEWS and OMAR JERMAINE WALKER that, upon their conviction of any of the offenses charged herein, the United States will seek forfeiture in accordance with Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Sections 922(a)(6) and 924, including but not limited to the following assets: (a) one Phoenix Arms, .25 caliber pistol, serial number 4418903; (b) one Phoenix Arms, .25 caliber pistol, serial number 4447357; (c) one Jimenez Arms, .380 caliber pistol, serial number 361348; (d) one Jimenez Arms, .380 caliber pistol, serial number 361436; (e) one Taurus International, .380 caliber pistol, serial number 05603D; (f) one Glock, .45 caliber pistol, serial number WNX331; and (g) one Jimenez Arms, .380 caliber pistol, serial number 352726.

7. If any of the above-described forfeitable property, 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

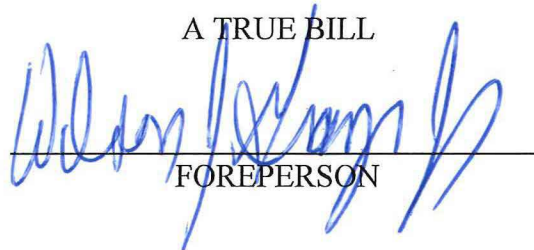
divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p),

to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

BY: 
ACTING UNITED STATES ATTORNEY
PURSUANT TO 28 C.F.R. O.136

No. _____

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

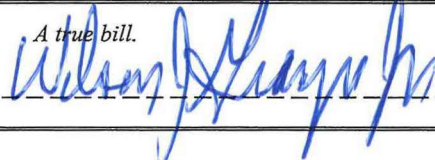
RICHARD ALMAREZ, also known as "Rated R," BONNAY BENFORD, also known as "Popalot," MARQUEZ BRIDGES, also known as "Tega," TERRELL BROWN, also known as "Rellz," TISLAM CATO, also known as "Vietnam," MICAH ISAIAH DESUZE, SHAHEEM EVANS, also known as "Sha," JOSEPH ISAR RAS, also known as "Bada Boom," ELVIN SANABRIA, also known as "Rico," JEREMY SANCHEZ, also known as "Jermz," ASHANTI SEASE-MATTHEWS and OMAR JERMAINE WALKER,

Defendants.

SUPERSEDING INDICTMENT

(T. 18, U.S.C., §§ 371, 922(a)(6), 924(a)(2), 924(d), 2 and 3551 et seq.;
T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c).)

A true bill.



Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Margaret E. Gandy/Rena Paul, Assistant U.S. Attorneys – (718) 254-7000