

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

United States

v.

ANTONIO BONHEUR &  
SAUL ALISME

**Docket No. 25-MJ-6769-MPK**

SUPPLEMENTAL AFFIDAVIT

I, Special Agent Todd Bucci of the USDA OIG state that the following is true to the best of my knowledge:

1. I am the lead case agent in the above-captioned case involving Jesula Variety Store and Saul Mache Mixe Store. Both stores are located at 1549 Blue Hill Avenue in Mattapan, Massachusetts.
2. As part of the investigation, I undertook comparison queries of supermarkets in the area of Boston, Massachusetts, for the total amount of SNAP Redemptions. This comparison was designed to understand the amount of SNAP redemption transactions taking place at supermarkets near to 1549 Blue Hill Avenue in Mattapan, Massachusetts. I know that some supermarkets are generally 20,000 to 60,000 square feet in size, have a dozen or more registers, numerous employees, large shelving capacity, carriages, handbaskets, and large parking lots to accommodate thousands of customers per day.
3. In my capacity of a Special Agent with USDA OIG, I have access to what is referred to as ALERT data, which is the tabulation of all SNAP Benefit transactions on a per-store basis. This database is what I queried to conduct this analysis. I based my review on supermarkets within a 4 mile radius from 1549 Blue Hill Avenue, Mattapan, in order to capture the geographic and demographic circumstances of Jesula Variety Store and Saul Mache Mixe Store.
4. I selected seven stores that were characterized as supermarkets within Food Nutrition Service databases. I conducted open-source research on each supermarket and learned that all are large premises with thousands of square feet of retail space, freezers, refrigerators, numerous registers, optical scanners, carriages and other infrastructure consistent with what is commonly considered a supermarket.
5. As part of this comparison, I reviewed SNAP Benefit redemption data for seven supermarkets within 4 miles of Jesula Variety Store and Saul Mache Mixe Store. The ALERT data I reviewed was all transactional for the year of 2025 for the seven supermarkets. I conducted an average monthly redemption analysis in order to determine the total amount of SNAP Benefits that were being redeemed at each supermarket.
  - a. One supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$57,981.

- b. Another supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$82,752.
  - c. A third supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$153,180.
  - d. A fourth supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$220,994.
  - e. A fifth supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$330,496.
  - f. A sixth supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$385,098.
  - g. A seventh supermarket within 4 miles of 1549 Blue Hill Avenue, conducted an average monthly SNAP Benefit redemption of \$385,098.
6. I then conducted an analysis of the ALERT data for the seven (7) large supermarkets.
- a. The average monthly SNAP Benefit redemptions of those seven supermarkets averaged at \$230,808.00 per month, significantly less than what Jesula Variety Store was redeeming per month. *See* Complaint Affidavit, pp. 20-22.
  - b. The average SNAP Benefit Redemption transaction amount at the seven supermarkets in 2025 was \$41.38. SNAP Benefit Redemption transactions over \$95 comprised an average of 10.15% of all SNAP Benefit Redemption transactions at the seven supermarkets.
  - c. Based on the data I reviewed, the average SNAP Benefit Redemption transaction at Jesula Variety Store was \$272.22.
  - d. At Jesula Variety Store transactions over \$95 comprised 84.1% of all SNAP Benefit Redemption transactions.
7. I also reviewed ALERT transaction data for Jesula Variety Store for all SNAP Benefit transactions at or greater than \$499 and \$1,000 since 2021.
- a. For the period from 2021 through December 15, 2025, Jesula Variety Store had 3369 SNAP Benefit transactions for \$499 or more.
  - b. For the period from 2021 through December 15, 2025, Jesula Variety Store had 178 SNAP Benefit transactions for \$999 or more.
  - c. Of further note:
    - i. Jesula Variety Store conducted a SNAP Benefit transaction on July 30, 2024, for \$2,781.60 for a SNAP Benefit recipient with an EBT card issued from Florida.

- ii. Jesula Variety Store conducted a SNAP Benefit transaction on September 14, 2024, for \$2,476.60 for a SNAP Benefit recipient with an EBT card issued from Massachusetts.
- iii. Jesula Variety Store conducted a SNAP Benefit transaction on October 8, 2024, for \$2,001.79 for a SNAP Benefit recipient with an EBT card issued from Massachusetts.
- iv. Jesula Variety Store conducted a SNAP Benefit transaction on September 30, 2025, for \$2,400.20 for a SNAP Benefit recipient with an EBT card issued from New York.
- v. Jesula Variety Store conducted a SNAP Benefit transaction on October 1, 2025, for \$2,427.10 for a SNAP Benefit recipient with an EBT card issued from New York.

I swear that the information above is true to the best of my knowledge under the penalties of perjury.

By: Todd Bucci  
Special Agent Todd Bucci  
USDA OIG

Date: December 17, 2025