

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                          |                            |
|--------------------------|----------------------------|
| - - - - -                | X                          |
| UNITED STATES OF AMERICA | :                          |
|                          | :                          |
| - v. -                   | :                          |
|                          | :                          |
|                          | : <u>SEALED INDICTMENT</u> |
| ZUBEARU BETTIS,          | :                          |
| STEPHEN ADAMS, and       | : S1 15 Cr. 410 (LAK)      |
| MICHAEL ADAMS            | :                          |
|                          | :                          |
| Defendants.              | :                          |
| - - - - -                | X                          |

COUNT ONE

The Grand Jury charges:

1. In or about June 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS agreed to commit a robbery of an individual involved in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT TWO

The Grand Jury further charges:

2. On or about June 15 and 16, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ZUBEARU BETTIS and STEPHEN ADAMS robbed an individual involved in commercial activities that affected interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT THREE

The Grand Jury further charges:

3. On or about June 18, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS, the defendants, unlawfully and knowingly did commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS robbed an individual involved in commercial activities that

affected interstate commerce.

(Title 18, United States Code, Section 1951.)

COUNT FOUR

The Grand Jury further charges:

4. On or about June 15 and 16, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS and STEPHEN ADAMS, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was brandished and discharged in the vicinity of 2251 7th Avenue, in Manhattan.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii), 924(c)(1)(A)(iii), and 2.)

COUNT FIVE

The Grand Jury further charges:

5. On or about June 18, 2015, in the Southern District of New York and elsewhere, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS, the defendants, willfully and knowingly, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the robbery charged in Count Three of this Indictment,

did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was discharged, and in the course of that crime did cause the death of Bubacarr Camera through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS robbed at gunpoint a shopkeeper in the vicinity of 906 Amsterdam Avenue in Manhattan, and did unlawfully kill the shopkeeper, Bubacarr Camera, by shooting him with a firearm during that robbery.

(Title 18, United States Code, Sections 924(c)(1)(A), 924(j)(1), and 2.)

FORFEITURE ALLEGATION AS TO COUNTS ONE, TWO, AND THREE

6. As a result of committing the robbery offenses alleged in Counts One, Two, and Three of this Indictment, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, any and all property constituting or derived from any proceeds said defendants obtained directly or indirectly as a result of the violations alleged in Counts One, Two, and Three of this Indictment, including but not limited to the proceeds obtained as a result of the offenses alleged in Counts One, Two, and Three of this Indictment.

FORFEITURE ALLEGATION AS TO COUNTS FOUR AND FIVE

7. As a result of committing the firearms offenses alleged in Counts Four and Five of this Indictment, ZUBEARU BETTIS, STEPHEN ADAMS, and MICHAEL ADAMS, the defendants, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461, any firearm or ammunition involved in or used in the violations alleged in Counts Four and Five of this Indictment.

Substitute Asset Provision

8. 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 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 18 U.S.C. § 982(b) and 21 U.S.C. § 853(p) to seek forfeiture of any other

property of said defendants up to the value of the above  
forfeitable property.

(Title 18, United States Code, Sections 981 and 924, and Title  
28, United States Code, Section 2461.)



FOREPERSON

*Preet Bharara*

PREET BHARARA *PK*  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ZUBEARU BETTIS,  
STEPHEN ADAMS, and  
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Defendants.

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SEALED INDICTMENT

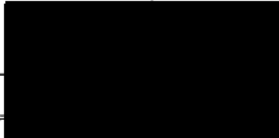
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(Title 18, United States Code, Sections  
924(c), 924(j), 1951, and 2)

PREET BHARARA

United States Attorney.

A TRUE BILL

 Foreperson.

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