

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:   
UNITED STATES OF AMERICA : SEALED  
: SUPERSEDING  
- v. - : INDICTMENT  
:   
SEAN MERCHANT, : S2 18 Cr. 527 (KMW)  
a/k/a "Bronxwood," :   
REUBEN SANDS, :   
MARTIQUE MCGRIFF, :   
a/k/a "Analyze," :   
JERMAINE MYRIE, :   
a/k/a "Rapp," and :   
STEVEN LESANE, :   
a/k/a "Steve-O," :   
:   
Defendants. :   
:   
- - - - - x

COUNT ONE

(Conspiracy to Commit Sex Trafficking)

The Grand Jury charges:

1. From in or about January 2016, up to and including in or about June 2018, within the Southern District of New York and elsewhere, SEAN MERCHANT, a/k/a "Bronxwood," REUBEN SANDS, MARTIQUE MCGRIFF, a/k/a "Analyze," JERMAINE MYRIE, a/k/a "Rapp," STEVEN LESANE, a/k/a "Steve-O," the defendants, together with others known and unknown, did willfully and knowingly combine, conspire, confederate, and agree together and with each other to commit sex trafficking, in violation of Title 18, United States Code, Sections 1591(a)(1), (a)(2) and (b).

2. Victims of the defendants' sex trafficking conspiracy included minor girls who resided at a particular non-incarceratory residential treatment facility located in Westchester County, New York ("Facility-1"), which provided housing for at-risk and troubled children and adolescents on behalf of departments of social services for certain counties in New York State. Other victims of the conspiracy were young women who had reached 18 years of age.

3. It was a part and an object of the conspiracy that SEAN MERCHANT, a/k/a "Bronxwood," REUBEN SANDS, MARTIQUE MCGRIFF, a/k/a "Analyze," JERMAINE MYRIE, a/k/a "Rapp," STEVEN LESANE, a/k/a "Steve-O," the defendants, and others known and unknown, willfully and knowingly, in and affecting interstate and foreign commerce, would and did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one and more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one and more commercial sex acts, and (2) one and more such persons had not attained the age of 18 years and would be caused to engage in

one and more commercial sex acts, to wit, MERCHANT, SANDS, MCGRIFF, MYRIE, and LESANE recruited women and minor girls to engage in prostitution at various locations in the Bronx, New York, including at least three minor victims who were, at various points, residents of Facility-1.

(Title 18, United States Code, Section 1594(c).)

COUNT TWO

(Sex Trafficking)

The Grand Jury further charges:

4. The allegations in paragraph 2 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

5. From in or about March 2017, up to and including in or about May 2018, within the Southern District of New York and elsewhere, SEAN MERCHANT, a/k/a "Bronxwood," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that one or more such persons had not attained the age of 14 years and would be caused to engage in one and more commercial sex acts, to wit, MERCHANT recruited a minor victim

who was less than 14 years old ("Victim-1"), then a resident of Facility-1, and continued for over a year to harbor, transport, provide, obtain, advertise, and maintain Victim-1, and caused Victim-1 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MERCHANT.

(Title 18, United States Code, Sections 1591(a), (b)(1), (b)(2) and 2.)

COUNT THREE

(Sex Trafficking)

The Grand Jury further charges:

6. The allegations in paragraph 2 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

7. From in or about March 2017, up to and including in or about October 2017, within the Southern District of New York and elsewhere, SEAN MERCHANT, a/k/a "Bronxwood," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section

1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, MERCHANT recruited, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-2"), then a resident of Facility-1, and, through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-2 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MERCHANT.

(Title 18, United States Code, Sections 1591(a), (b)(2) and 2.)

COUNT FOUR

(Sex Trafficking)

The Grand Jury further charges:

8. From in or about January 2016, up to and including in or about March 2018, within the Southern District of New York and elsewhere, SEAN MERCHANT, a/k/a "Bronxwood," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of

the fact that force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause such persons to engage in one and more commercial sex acts, to wit, MERCHANT recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained an adult victim ("Victim-3"), and, through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-3 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MERCHANT.

(Title 18, United States Code, Sections 1591(a), (b)(1), and 2.)

COUNT FIVE

(Sex Trafficking)

The Grand Jury further charges:

9. The allegations in paragraph 2 of this Superseding Indictment are repeated and realleged as if fully set forth herein.

10. From in or about January 2016, up to and including in or about April 2016, within the Southern District of New York and elsewhere, JERMAINE MYRIE, a/k/a "Rapp," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by

receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that (1) means of force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means would be used to cause such persons to engage in one or more commercial sex acts, and (2) that one or more such persons had not attained the age of 18 years and would be caused to engage in one and more commercial sex acts, to wit, MYRIE recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained a minor victim ("Victim-4"), then a resident of Facility-1, and, through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-4 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MYRIE.

(Title 18, United States Code, Sections 1591(a), (b)(1), (b)(2) and 2.)

COUNT SIX

(Sex Trafficking)

The Grand Jury further charges:

11. From in or about January 2018, up to and including in or about May 2018, within the Southern District of New York and elsewhere, MARTIQUE MCGRIFF, a/k/a "Analyze," the defendant, willfully and knowingly, in and affecting interstate and foreign

commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause such persons to engage in one and more commercial sex acts, to wit, MCGRIFF recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained an adult victim ("Victim-5"), and, through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-5 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to MCGRIFF.

(Title 18, United States Code, Sections 1591(a), (b)(1) and 2.)

COUNT SEVEN

(Sex Trafficking)

The Grand Jury further charges:

12. From in or about September 2010 up to and including in or about December 2011, within the Southern District of New York and elsewhere, STEVEN LESANE, a/k/a "Steve-O," the defendant, willfully and knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide,

obtain, advertise, maintain, patronize, and solicit by any means one or more persons, and did benefit, financially and by receiving things of value, from participation in a venture that engaged in any such act, knowing and in reckless disregard of the fact that force, threats of force, fraud, coercion, as described in Title 18, United States Code, Section 1591(e)(2), and a combination of such means, would be used to cause such persons to engage in one and more commercial sex acts, to wit, LESANE recruited, enticed, harbored, transported, provided, obtained, advertised, and maintained an adult victim ("Victim-6"), and, through force, threats of force, fraud, coercion, and a combination of such means, caused Victim-6 to engage in at least one commercial sex act, the proceeds of which were transferred at least in part to LESANE.

(Title 18, United States Code, Sections 1591(a), (b)(1) and 2.)

#### FORFEITURE ALLEGATIONS

13. As a result of committing the offenses alleged in Counts One through Seven of this Indictment, SEAN MERCHANT, a/k/a "Bronxwood," REUBEN SANDS, MARTIQUE MCGRIFF, a/k/a "Analyze," JERMAINE MYRIE, a/k/a "Rapp," and STEVEN LESANE, a/k/a "Steve-O," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594(d), any property, real and personal, that was involved in, used, or intended to be used to commit or to facilitate the

commission of the offenses alleged in Counts One through Seven, and any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses alleged in Counts One through Seven, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Asset Provision

14. 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;

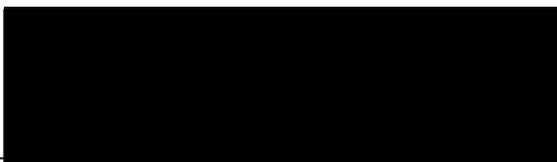
(d) has been substantially diminished in value; or

(e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C.

§ 853(p) and 28 U.S.C. § 2461(c), 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 1594; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON

  
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GEOFFREY S. BERMAN  
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.

SEAN MERCHANT,  
a/k/a "Bronxwood,"  
REUBEN SANDS,  
MARTIQUE MCGRIFF,  
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JERMAINE MYRIE,  
a/k/a "Rapp," and  
STEVEN LESANE,  
a/k/a "Steve-O".

Defendants.

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SUPERSEDING  
INDICTMENT

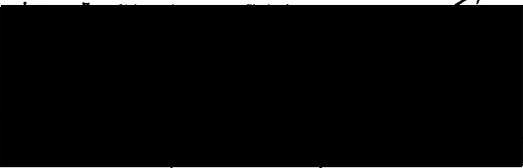
S2 18 Cr. 527 (KMW)

(18 U.S.C. §§ 1591(a)(1), (2),  
(b)(1), (2), 1594(c), and 2)

GEOFFREY S. BERMAN

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