

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : **SUPERSEDING INDICTMENT**
:
- v. - : S1 22 Cr. 96 (ALC)
:
MELVIN BURROUGHS, :
:
: Defendant.
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x

COUNT ONE
(Conspiracy to Traffic Firearms)

The Grand Jury charges:

1. From at least in or about 2019 up to and including in or about January 2022, in the Southern District of New York and elsewhere, MELVIN BURROUGHS, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, trafficking in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that MELVIN BURROUGHS, the defendant, and others known and unknown, not being licensed importers, licensed manufacturers, and licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did willfully and knowingly engage in the business of importing, manufacturing, and dealing in firearms, and

in the course of such business would and did ship, transport, and receive firearms in interstate and foreign commerce, in violation of Title 18, United States Code Section 922(a)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, MELVIN BURROUGHS, the defendant, together with others known and unknown, committed the following overt act, among others, in the Southern District of New York and elsewhere:

a. On or about January 8, 2022, BURROUGHS purchased parts for 18 firearms for resale and then transported those parts from Pennsylvania through Manhattan, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Firearms Trafficking)

The Grand Jury further charges:

4. From at least in or about 2019 up to and including in or about January 2022, in the Southern District of New York and elsewhere, MELVIN BURROUGHS, the defendant, not being a licensed imported, licensed manufacturer, and licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, did willfully and knowingly engage in the business of importing, manufacturing, and dealing in firearms, and in the course of such business did ship, transport, and receive firearms in interstate and foreign commerce, and aided and abetted the same, and, with

the intent to engage in conduct that constitutes a violation of Section 922(a)(1)(A), traveled from any State and foreign country into any other State and acquired, and attempted to acquire, a firearm in such other State in furtherance of such purpose, to wit, BURROUGHS traveled from Connecticut to Pennsylvania to acquire firearms, and transported firearms for the purpose of illegally reselling the firearms.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(n), and 2.)

COUNT THREE
(Felon in Possession of Firearm or Ammunition)

The Grand Jury further charges:

5. On or about January 8, 2022, in the Southern District of New York and elsewhere, MELVIN BURROUGHS, the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess ammunition, to wit, 500 rounds of CK9 9mm ammunition, and the ammunition was in and affecting commerce.

(Title 18, United States Code, Sections 922(g)(1), 924(a)(2), and 2.)

FORFEITURE ALLEGATIONS

6. As a result of committing the offenses alleged in Counts One, Two, and Three of this Indictment, MELVIN BURROUGHS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 924(d)(1) 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, and any and all firearms and ammunition involved in, or used in, or intended to be used in, said offense, including but not limited to:

a. Seven Polymer80 complete subcompact 9mm build kits with ported slides;

b. 10 Polymer 80 complete subcompact 9mm build kits with non-ported slides;

c. one completed AR-15 rifle lower receiver

d. 500 rounds of CK9 9mm ammunition;

e. one Glock Style 9mm pistol with tan lower receiver;

f. one Glock style 9mm pistol with green lower receiver;

g. one .50 caliber Magnum Research Incorporated Desert Eagle pistol;

h. one red and black customized AR-15 style rifle with the words "SUU WHOOP" etched on the ejection port cover; and

i. various ammunition seized from 14 Sixth Street, Ansonia Connecticut, on or about March 15, 2021 in connection with Ansonia Police Department CFS number 2100002983.

Substitute Assets Provision

7. 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, Sections 981, 982, and 924(d);
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

MELVIN BURROUGHS,

Defendant.

SUPERSEDING INDICTMENT

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(18 U.S.C. §§ 371, 922(a)(1)(A),
922(g)(1), 924(a)(2), 924(n), and 2.)

DAMIAN WILLIAMS
United States Attorney



Foreperson

7/20/22

Superseding Indictment
filed before OTW on 7/20/22

