

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

No. 1:22-CR-114

vs.

Hon. JANE M. BECKERING
U.S. District Judge

GERALD BENNETT,
a/k/a "Roach" and "Roach-El,"

SUPERSEDING
INDICTMENT

Defendant.

_____ /

The Grand Jury charges:

COUNT 1

Conspiracy to Commit Murder for Hire Resulting in Death

Beginning in or about November 2017, and continuing through at least March 2019, the exact dates being unknown to the grand jury, in Kent, Allegan, and Kalamazoo Counties, in the Southern Division of the Western District of Michigan, and elsewhere, the defendant,

GERALD BENNETT,
a/k/a "Roach" and "Roach El,"

Quinn James, and D.E. knowingly combined, conspired, and agreed to use a facility of interstate commerce, including but not limited to one or more of the following: cellular telephones and text messaging applications, an electronic money transfer system, Interstate Highway 96, and United States Highway 131, with the intent that the murder of M.D. be committed in violation of the laws of the State of Michigan as consideration for the receipt of, and as consideration for a promise and agreement to pay, things of

pecuniary value, including but not limited to one or more of the following: an electronic money transfer, a Chevrolet Caprice sedan, and narcotics; and the conspiracy resulted in M.D.'s death.

Introduction

1. During the relevant time period, GERALD BENNETT and D.E. resided in the area of Detroit, Michigan, and Quinn James resided in the area of Grand Rapids, Michigan.
2. In 2017, M.D., who turned 16 that year, accused Quinn James of raping her.

Overt Acts

3. After Quinn James became aware of M.D.'s accusation, Quinn James contacted D.E. seeking someone to kill or help him kill M.D.
4. On or about January 3, 2018, D.E. advised Quinn James by means of a cellular communications network that he "Got some body [sic]!" D.E. gave Quinn James the telephone number of GERALD BENNETT and referred to BENNETT by the nickname "Roach."
5. On or about January 18, 2018, Quinn James obtained a "loaner" GMC Acadia sport utility vehicle from a dealership.
6. On or about January 21, 2018, Quinn James drove east on Interstate Highway 96 to the area of Detroit, Michigan, picked up GERALD BENNETT, and drove back to Grand Rapids, Michigan on Interstate Highway 96.

7. On or about January 23, 2018, Quinn James and GERALD BENNETT went to a Meijer Store and made a wire transfer of \$137.50 to GERALD BENNETT's girlfriend.
8. On or about January 24, 2018, M.D. was strangled to death and her body was left in the woods in Kalamazoo County. Quinn James and GERALD BENNETT traveled to and returned from Kalamazoo County by driving on United States Highway 131.
9. On or about January 24, 2018, Quinn James obtained a Chevrolet Caprice and gave the vehicle to GERALD BENNETT, who then drove back to Detroit, Michigan.

18 U.S.C. § 1958(a)

COUNT 2
Kidnapping Resulting in Death

On or about January 24, 2018, in Kent, Allegan, and Kalamazoo Counties, in the Southern Division of the Western District of Michigan and elsewhere, the defendant,

GERALD BENNETT,
a/k/a “Roach” and “Roach El,”

and Quinn James unlawfully and willfully seized, confined, kidnapped, abducted, and carried away and held M.D. for reward and otherwise, and aided and abetted each other, and in committing and in furtherance of the commission of the offense, used a means, facility, and instrumentality of interstate commerce, including, but not limited to, one or more of the following: Interstate Highway 96, United States Highway 131, a cellular communications network, an electronic money transfer system, and a national banking system.

The kidnapping resulted in M.D.’s death.

18 U.S.C. § 1201(a)(1)

18 U.S.C. § 2

COUNT 3
Kidnapping of a Minor Victim

On or about January 24, 2018, in Kent, Allegan, and Kalamazoo Counties, in the Southern Division of the Western District of Michigan and elsewhere, the defendant,

GERALD BENNETT,
a/k/a “Roach” and “Roach El,”

and Quinn James unlawfully and willfully seized, confined, kidnapped, abducted, and carried away and held M.D. for reward and otherwise, and aided and abetted each other, and in committing and in furtherance of the commission of the offense, used a means, facility, and instrumentality of interstate commerce, including, but not limited to, one or more of the following: Interstate Highway 96, United States Highway 131, a cellular communications network, an electronic money transfer system, and a national banking system.

M.D. was approximately sixteen years old, and the defendant, GERALD BENNETT, was approximately fifty-eight years old, and Quinn James was approximately forty-two years old, and neither was a parent, grandparent, brother, uncle, or individual having legal custody of M.D.

18 U.S.C. § 1201(a)(1)
18 U.S.C. § 1201(g)(1)
18 U.S.C. § 2

COUNT 4
Solicitation to Commit a Crime of Violence

In or about November of 2022, in Newaygo County, in the Southern Division of the Western District of Michigan, the defendant,

GERALD BENNETT,
a/k/a “Roach” and “Roach El,”

with the intent that another person engage in conduct constituting a felony that has as an element the use of physical force against the person of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, solicited, commanded, induced and endeavored to persuade such other person to engage in such conduct.

Specifically, the defendant asked M.R. to kill D.E. with the intent to prevent the attendance and testimony of D.E. in the trial of the defendant, in violation of Title 18, United States Code, Section 1512(a)(1)(A). The circumstances that strongly corroborate that intent include, but are not limited to;

1. The defendant offered to pay M.R. \$10,000 up front, if he agreed to do the killing and pay an additional \$10,000 once D.E. was dead;
2. The defendant was aware that M.R. was a suspect in a firearms incident and believed that M.R. would be released from custody within months;
3. The defendant told M.R. that he would continue faking his incompetency to give M.R. time to complete his sentence, get released from jail, and find and kill D.E.;
4. Defendant continued to fake incompetency after speaking with M.R.;

5. The defendant told J.B. about his case and upcoming trial. The defendant asked J.B. for help to find a person to make someone disappear. The defendant asked J.B. to tell everyone that D.E. is a “rat” and that the defendant wanted to kill D.E. The defendant knew that J.B. was still in contact with D.E. and asked J.B. for information as to where D.E. was currently located;
6. The defendant offered to kill a witness against J.B. as payment for J.B.’s information about D.E.’s location; and
7. The defendant repeatedly asked M.R. to commit the killing of D.E. and repeatedly asked J.B. for information about D.E.’s location.

18 U.S.C. § 373

18 U.S.C. § 1512(a)(1)(A)

A TRUE BILL



GRAND JURY FOREPERSON

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