

Approved: Allen G. Kopp
GLEN A. KOPP
Assistant United States Attorneys

Before: HONORABLE JAMES C. FRANCIS
United States Magistrate Judge
Southern District of New York

08 MAG 1457

UNITED STATES OF AMERICA	:	<u>SEALED COMPLAINT</u>
- v. -	:	Violation of
VIJENDRA GANGADEEN,	:	18 U.S.C. §§ 371,
RICHIE SEUPERSAD, and	:	1028(a)(2) and 2
SUSAN HONEYCUTT,	:	COUNTY OF OFFENSE:
Defendants.	:	BRONX

SOUTHERN DISTRICT OF NEW YORK, ss.:

NICHOLAS MINERVINI, being duly sworn, deposes and states that he is a Special Agent of the Bureau of Immigration and Customs Enforcement ("ICE"), and charges as follows:

COUNT ONE

1. From in or about January 2007, up to and including on or about June 18, 2008, in the Southern District of New York and elsewhere, VIJENDRA GANGADEEN, RICHIE SEUPERSAD and SUSAN HONEYCUTT, the defendants, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Sections 1028(a)(2) and 2.

2. It was a part and object of the conspiracy that VIJENDRA GANGADEEN, RICHIE SEUPERSAD and SUSAN HONEYCUTT, the defendants, unlawfully, willfully and knowingly, would and did transfer and cause to be transferred false identification documents, knowing such documents were produced without lawful authority in violation of Title 18, United States Code, Sections 1028(a)(2) and 2.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about March 31, 2008, VIJENDRA GANGADEEN, the defendant, drove from Queens, New York, through the Bronx, New York, as part of a trip to North Carolina.

b. On or about April 1, 2008, SUSAN HONEYCUTT, the defendant, provided GANGADEEN, with a false North Carolina driver's license, at a North Carolina Department of Motor Vehicles office (the "DMV Office").

c. On or about June 18, 2008, RICHIE SEUPERSAD, the defendant, drove two individuals to the DMV Office to obtain false North Carolina driver's licenses.

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

The bases for my knowledge and for the foregoing charges are, in part, as follows:

4. I am a Special Agent with ICE, and I have been involved personally in the investigation of this matter. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, including interviews. I have conducted, my examination of reports and records, and my conversations with other law enforcement officers and other individuals. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, unless noted otherwise.

5. Based on my conversation with a special agent with ICE ("Special Agent-1") who, on or about March 27, 2008, participated in a consensual recorded telephone call involving VIJENDRA GANGADEEN, the defendant, and a Confidential Source ("CS-1"), I learned that CS-1 told GANGADEEN that he might have someone for GANGADEEN to take to North Carolina to secure a false driver's license.

6. Between on or about March 30, 2008, and March 31, 2008, I participated in a series of consensual recorded telephone calls that involved VIJENDRA GANGADEEN, the defendant, and CS-1. I learned the following from the telephone calls:

a. During a March 30, 2008 telephone call, GANGADEEN and CS-1 discussed how many people he, CS-1, intended to bring on the upcoming trip to North Carolina to secure fake driver's licenses with GANGADEEN. GANGADEEN said that he planned to leave for North Carolina on Tuesday, April 1, 2008, and that he wanted \$5,000 per person to take the trip.

b. During a March 31, 2008 telephone call, GANGADEEN asked CS-1 how many people CS-1 planned to bring to North Carolina. CS-1 one replied that he only had one customer ("Customer-1"). GANGADEEN stated that he too had only one customer who would make the trip the next day. GANGADEEN told CS-1 that it would now cost \$4,500 total per customer to make the trip; \$3,500 would go to his contact in North Carolina, "Richie," later identified as RICHIE SEUPERSAD, the defendant, and GANGADEEN would keep \$1,000.

c. During a second March 31, 2008 telephone call, GANGADEEN informed CS-1 that the price for the trip to North Carolina would be \$5,000; \$3,500 would go to "Richie" and \$1,500 would go to GANGADEEN. According to GANGADEEN, the price went up because with only one person going on the trip to North Carolina, GANGADEEN had to pay more to cover the price of gas. GANGADEEN told CS-1 that he would need to pay \$1,000 for a new driver's license for himself because he had lost his driver's license.

d. During a third March 31, 2008 telephone call, CS-1 informed GANGADEEN that the price was too high for Customer-1. GANGADEEN told CS-1 that the price he quoted to CS-1 is the price for a driver's license, and that if Customer-1 wanted a driver's license Customer-1 had to pay for it.

7. Based on a review of telephone cell site records for the same cellular telephone phone used by VIJENDRA GANGADEEN, the defendant, in the aforementioned telephone calls, I have learned the following:

a. Between in or about May 2007 and January 16, 2008, GANGADEEN made at least ten trips to North Carolina.

b. On or about March 31, 2008, GANGADEEN traveled from Queens, New York, through the Bronx, New York towards North Carolina.

c. On or about April 1, 2008, GANGADEEN arrived in North Carolina.

8. Based on conversations with a representative from the North Carolina DMV ("Representative-1"), I learned the following:

a. Each North Carolina DMV license examiner is issued a Resource Access Facility Identification number ("RAC ID") that is linked to each license an examiner issues.

b. On or about April 2, 2007, VIJENDRA GANGADEEN, the defendant, received a fraudulent North Carolina driver's license at the DMV Office, from an examiner with the RAC ID assigned to SUSAN HONEYCUTT, the defendant. The North Carolina license issued to GANGADEEN was provided based on false information and contains a non-existent North Carolina address.

c. On or about April 1, 2008, GANGADEEN received a replacement North Carolina driver's license at the DMV Office, from an examiner with the RAC ID assigned to HONEYCUTT.

d. On or about April 1, 2008, HONEYCUTT issued a false North Carolina Driver's license to an individual ("Customer-2").

e. Between on or about January 1, 2007 and on or about June 18, 2008, HONEYCUTT has issued approximately 150 false North Carolina driver's licenses based on fraudulent information and with non-existent addresses.

9. Based on my review of ICE records, I learned the following:

a. VIJENDRA GANGADEEN, the defendant, and Customer-2 are illegal aliens.

b. Of the approximately 150 false licenses that SUSAN HONEYCUTT, the defendant, has issued, as described above, none of the recipients of driver's licenses have legal status in the United States.


10. Based on my conversations with a special agent with ICE ("Special Agent-2") in North Carolina, I have learned the following:

a. A surveillance video taken on or about June 18, 2008, of the parking lot of the DMV Office shows RICHIE SEUPERSAD, the defendant, arriving in a car at around 1:00 p.m. One individual ("Customer-3") exits the car, followed by SEUPERSAD, and both enter the DMV Office. SEUPERSAD then leaves the DMV Office, followed shortly thereafter by Customer-3. Another individual ("Customer-4") then exits the car, and enters the DMV Office.

b. On or about June 18, 2008, between approximately 1:00 p.m. and 1:20 p.m., SUSAN HONEYCUTT, the defendant, issued two false North Carolina driver's licenses to Customer-3 and Customer-4, both illegal aliens.


c. On or about June 18, 2008, at around 1:20 p.m., SEUPERSAD drove out of the parking lot with Customer-3 and Customer-4.

WHEREFORE, the deponent respectfully requests that a warrant be issued for the arrest of VIJENDRA GANGADEEN, RICHIE SEUPERSAD and SUSAN HONEYCUTT, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.


NICHOLAS MINERVINI
SPECIAL AGENT
BUREAU OF IMMIGRATION AND
CUSTOMS ENFORCEMENT

Sworn to before me this
day of June, 2008

JUN 26 2008


UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK
JAMES C. FRANCIS IV
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK