

KTF:KPO
F. #2024R00176

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

YASHIYA LOUISDOR, also known as
"Pepe,"
ZAIRE ALMAN, also known as "Zye,"
MARQUES SEALS, also known as
"Kobe," and
[REDACTED]

Defendants.

----- X

THE GRAND JURY CHARGES:

COUNT ONE
(Firearms Trafficking)

1. In or about and between February 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants YASHIYA LOUISDOR, also known as "Pepe," ZAIRES ALMAN, also known as "Zye," MARQUES SEALS, also known as "Kobe," and [REDACTED] together with others, did knowingly and intentionally (a) ship, transport, transfer, cause to be transported and otherwise dispose of one or more firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying and possession of a firearm by the recipient would constitute a felony; and (b) receive from another person one or more firearms, in and affecting interstate and foreign

I N D I C T M E N T

Cr. No. 24-CR-187
(T. 18, U.S.C., §§ 371, 922(a)(1)(A),
922(a)(3), 922(k), 924(a)(1)(B),
924(a)(1)(D), 924(d)(1), 933(a)(1),
933(a)(2), 933(a)(3), 933(b), 934(a), 2
and 3551 et seq.; T. 21, U.S.C., § 853(p);
T. 28, U.S.C., § 2461(c))

**Judge Nina R. Morrison
Magistrate James R. Cho**

commerce, knowing or having reasonable cause to believe that such receipt would constitute a felony.

(Title 18, United States Code, Sections 933(a)(1), 933(a)(2), 933(b), 2 and 3551 et seq.)

COUNT TWO

(Firearms Trafficking Conspiracy)

2. In or about and between February 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants YASHIYA LOUISDOR, also known as “Pepe,” ZAIRE ALMAN, also known as “Zye,” MARQUES SEALS, also known as “Kobe,” and [REDACTED] together with others, did knowingly and intentionally conspire to (a) ship, transport, transfer, cause to be transported and otherwise dispose of one or more firearms to another person, in and affecting interstate and foreign commerce, knowing and having reasonable cause to believe that the use, carrying and possession of a firearm by the recipient would constitute a felony; and (b) receive from another person one or more firearms, in and affecting interstate and foreign commerce, knowing or having reasonable cause to believe that such receipt would constitute a felony, contrary to Title 18, United States Code, Sections 933(a)(1) and 933(a)(2).

(Title 18, United States Code, Sections 933(a)(3), 933(b) and 3551 et seq.)

COUNT THREE

(Unlicensed Firearms Dealing Conspiracy)

3. In or about and between February 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, defendants YASHIYA LOUISDOR, also known as “Pepe,” ZAIRE ALMAN, also known as “Zye,” MARQUES SEALS, also known as “Kobe,” and [REDACTED]

██████████ together with others, did knowingly and willfully conspire to engage in the business of dealing in firearms without being licensed importers, licensed manufacturers or licensed dealers, and in the course of such business, to ship, transport and receive one or more firearms in interstate and foreign commerce, contrary to Title 18, United States Code, Section 922(a)(1)(A).

4. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendants YASHIYA LOUISDOR, ZAIRE ALMAN, MARQUES SEALS and ██████████, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about February 15, 2024, LOUISDOR sold four firearms to an undercover law enforcement officer (the “UC”) in Brooklyn, New York.

(b) On or about February 23, 2024, LOUISDOR and ALMAN sold one firearm with an obliterated serial number to the UC in Brooklyn, New York.

(c) On or about March 1, 2024, LOUISDOR and ALMAN sold two firearms to the UC in Brooklyn, New York.

(d) On or about March 5, 2024, LOUISDOR sold one firearm to the UC in Brooklyn, New York.

(e) On or about March 12, 2024, LOUISDOR and SEALS sold four firearms to the UC in Brooklyn, New York.

(f) On or about March 27, 2024, LOUISDOR sold four firearms to the UC in Brooklyn, New York.

(g) On or about April 1, 2024, LOUISDOR sold six firearms to the UC in Brooklyn, New York.

(h) On or about April 19, 2024, SEALS sold 14 firearms to the UC in Manhattan, New York.

(i) On or about April 22, 2024, ALMAN sold three firearms, one of which had an obliterated serial number, to the UC in Brooklyn, New York.

(j) On or about April 29, 2024, SEALS and ██████████ sold seven firearms, one of which had an obliterated serial number, to the UC in Manhattan, New York.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT FOUR
(Unlicensed Firearms Dealing)

5. In or about and between February 2024 and April 2024, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants YASHIYA LOUISDOR, also known as “Pepe,” ZAIRE ALMAN, also known as “Zye,” MARQUES SEALS, also known as “Kobe,” and ██████████ ██████████ together with others, each not being a licensed importer, licensed manufacturer or licensed dealer of firearms, did knowingly and intentionally engage in the business of dealing in firearms, and in the course of such business did ship, transport and receive one or more firearms in interstate and foreign commerce.

(Title 18, United States Code, Sections 922(a)(1)(A), 924(a)(1)(D), 2 and 3551 et seq.)

COUNT FIVE
(Possession of a Defaced Firearm – Taurus G3C)

6. On or about February 23, 2024, within the Eastern District of New York and elsewhere, the defendant YASHIYA LOUISDOR, also known as “Pepe,” together with others, did knowingly and intentionally possess a firearm, to wit: one Taurus, model G3C, 9mm

caliber pistol, knowing that such firearm had the manufacturer's serial number removed, obliterated and altered, and which firearm had been shipped and transported in interstate commerce.

(Title 18, United States Code, Sections 922(k), 924(a)(1)(B), 2 and 3551 et seq.)

COUNT SIX

(Possession of a Defaced Firearm – Taurus 709 Slim)

7. On or about April 22, 2024, within the Eastern District of New York and elsewhere, the defendant ZAIRE ALMAN, also known as “Zye,” together with others, did knowingly and intentionally possess a firearm, to wit: one Taurus model 709 slim, 9mm caliber pistol, knowing that such firearm had the manufacturer's serial number removed, obliterated and altered, and which firearm had been shipped and transported in interstate commerce.

(Title 18, United States Code, Sections 922(k), 924(a)(1)(B), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

8. The United States hereby gives notice to the defendants that, upon their conviction of either of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with Title 18, United States Code, Sections 924(d)(1) and 934(a)(1), and Title 28, United States Code, Section 2461(c), which require the forfeiture of: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offenses; (b) any property used, or intended to be used, in any manner or part, to commit, or to

facilitate the commission of, such offenses; and (c) any firearm or ammunition involved in or used in any violation of any criminal law of the United States.

9. 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 party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 934(a); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

**CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS THREE THROUGH SIX**

10. The United States hereby gives notice to the defendants that, upon their conviction of any of the offenses charged in Counts Three through Six, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition

involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

11. 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 party;
- (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 divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

By Carolyn Pokorny, Assistant US Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that this is crucial for ensuring the integrity of the financial statements and for providing a clear audit trail.

2. The second part of the document outlines the various methods used to collect and analyze data. It includes a detailed description of the sampling techniques employed and the statistical tests used to evaluate the results.

3. The third part of the document provides a comprehensive overview of the findings of the study. It discusses the implications of the results and offers recommendations for future research and practice.

4. The fourth part of the document concludes the study by summarizing the key points and reiterating the significance of the findings. It also includes a final statement on the author's commitment to transparency and ethical conduct.

5. The fifth part of the document contains the references and bibliography, listing all the sources used in the research. This section is essential for providing context and supporting the claims made in the paper.

6. The sixth part of the document includes the appendices, which provide additional information and data that are not included in the main text. These appendices are useful for readers who want to explore the details of the study further.

7. The seventh part of the document contains the index, which allows readers to quickly find the information they are looking for. This is a standard feature of academic papers and is essential for navigation.

8. The eighth part of the document includes the acknowledgments, where the author expresses gratitude to those who provided support and assistance during the research process. This is a common and important part of academic writing.

9. The ninth part of the document contains the disclaimer, which clarifies the scope and limitations of the study. This is important for ensuring that readers understand the boundaries of the research and its applicability.

10. The tenth part of the document includes the final conclusions and a call to action. It encourages readers to take the findings of the study into account and to contribute to the field in their own way.

The following table provides a summary of the key findings of the study. It shows that there is a significant positive correlation between the variables being studied, which supports the hypothesis of the research.

The data also indicates that there are several factors that influence the outcome of the study. These factors are discussed in detail in the text and are shown to have a significant impact on the results.

Overall, the study has provided valuable insights into the relationship between the variables being studied. The findings have important implications for both theory and practice, and they provide a solid foundation for further research in this area.

The study was conducted using a rigorous and systematic approach, and the results are highly reliable. The use of advanced statistical techniques and a large sample size have helped to ensure the accuracy and validity of the findings.

The author would like to thank the following individuals and organizations for their support and assistance during the course of the study. Their contributions were invaluable and have helped to make this research possible.

The author also wishes to express their appreciation to the anonymous reviewers of this journal for their helpful comments and suggestions. Their insights have greatly improved the quality of the paper and are gratefully acknowledged.

The author has no conflicts of interest to disclose. All data and materials used in the study are available upon request. The author also certifies that the work reported here is original and has not been published elsewhere.

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