

D.A. Bragg Announces Indictments In Sprawling Investigation That Charges City Employees In Ghost Gun And Fraud Conspiracies

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Investigation into Ghost Gun Factory Uncovered Interconnected Web of Alleged Criminal Activity, including New Ghost Gun Conspiracies and Pandemic Unemployment Assistance Program Fraud

NYC Department of Homeless Services Employees Were Key Ringleaders in Each Indictment

Manhattan District Attorney Alvin L. Bragg, Jr., today announced four indictments charging 18 people in a sprawling investigation that uncovered a wide range of alleged criminal conduct, including two conspiracies to manufacture ghost guns, a conspiracy to defraud the Pandemic Unemployment Assistance (“PUA”) program and a residential burglary.

These indictments arose from a 2022 investigation of a ghost gun factory in Cliffie Thompson’s East Village apartment, for which he was indicted in January 2023. The ongoing investigation in that matter uncovered two new alleged ghost gun conspiracies.

One ghost gun indictment charges CRAIG FREEMAN, 56, and CO-CONSPIRATOR ONE, who both worked at the Barbara Kleiman Shelter in Brooklyn for the Department of Homeless Services (“DHS”).

The evidence in those ghost gun conspiracies led the Office to discover the PUA fraud, which was allegedly led by CO-CONSPIRATOR ONE and CHARDE BAKER, 35, who was also a DHS employee. BAKER first worked at DHS and then became an NYPD employee in 2022. She was terminated from the NYPD in 2023 and eventually rejoined DHS.

As part of that conspiracy, CO-CONSPIRATOR ONE, BAKER, and other DHS employees allegedly used their positions to steal the personal identifying information of unsuspecting individuals, including homeless residents, to commit the fraud.

That investigation subsequently allowed the D.A.'s Office to uncover the burglary of CO-CONSPIRATOR ONE'S apartment, allegedly at BAKER's direction.

"As alleged, the takedown of a sophisticated ghost gun manufacturing operation uncovered wide-ranging schemes, including the link to a massive fraud and a planned burglary," said **District Attorney Bragg**. "These alleged schemes were orchestrated and largely operated by city employees, many of whom abused their positions of public trust for personal gain. We see a clear link between those engaging in violent crimes and traditional white-collar fraud at the same time. My Office will continue leveraging the expertise and tools available at our disposal to dismantle these types of interconnected schemes, no matter how complex they are. I thank all of our prosecutors, analysts and investigators for their hard work and diligence in following the facts and uncovering this series of criminal activity."

New York State Department of Labor Commissioner Roberta Reardon said, "This case represents a particularly egregious betrayal of public trust at a time when so many New Yorkers were in desperate need. Let this serve as a resounding message: we have zero tolerance for those who exploit crises for personal gain. If you steal benefits, the New York State Department of Labor and its partners will find you and prosecute to the fullest extent of the law."

"An important part of the mission of the U.S. Department of Labor, Office of Inspector General is to investigate allegations of fraud involving COVID-19 pandemic unemployment insurance programs. We will continue to work with our law enforcement partners to investigate these types of allegations," said **Jonathan Mellone, Special Agent-in-Charge, Northeast Region, U.S. Department of Labor, Office of Inspector General**.

"The Special Agents of the United States Postal Service Office of Inspector General are dedicated to maintaining the integrity of the Postal Service and its personnel. The USPS OIG will vigorously investigate Postal Service employees who compromise their integrity for personal gain. This case serves as an excellent example of the successful collaboration

between the USPS OIG, our law enforcement partners and the Manhattan District Attorney's Office to pursue and prosecute Postal Service employees involved in criminal activity. The U.S. Postal Service, Office of Inspector General would like to thank our law enforcement partners and the District Attorney's Office for their dedication and efforts in this investigation," said **Special Agent in Charge Matthew Modafferi, United States Postal Service Office of Inspector General (USPS-OIG), Northeast Area Field Office.**

DOI Commissioner Jocelyn E. Strauber said, "Some of the City employees charged in this indictment had access to sensitive personal information that was entrusted to them so that they could do their job assisting unhoused families. Instead, the defendants exploited that information to fraudulently pocket over \$1 million in unemployment benefits, in a scheme involving other current and former City employees. DOI is working with the City Department of Social Services to better protect clients' personal information and address any vulnerabilities. DOI thanks the Manhattan District Attorney's Office for its partnership in combatting fraud and corruption."

Ghost Gun Conspiracies

CO-CONSPIRATOR ONE and his friend ADRIENNE MANIGAULT, 25, are charged in one [indictment](#) with Conspiracy in the Fourth Degree [1] for buying ghost gun parts and manufacturing weapons from approximately May 14, 2022, to January 21, 2023. According to court documents and statements made on the record, the defendants purchased hundreds of dollars' worth of 3-D printing machines, 3-D printing materials and ghost gun parts. The two texted each other links to buy the parts and materials and would often share pictures and videos of their finished products. They purchased many of their materials from Amazon and eBay.

In one instance, on August 15, 2022, CO-CONSPIRATOR ONE sent MANIGAULT a picture of a fully constructed firearm with a blue plastic lower receiver. In another instance, on August 30, 2022, CO-CONSPIRATOR ONE sent MANIGAULT a picture of a firearm with a blue plastic receiver. MANIGAULT responded by stating she thought the firearm was "beautiful" and, "I want to shoot it."

This indictment also charges MANIGAULT with Tampering with Physical Evidence, for helping to remove evidence prior to the execution of a search warrant.

As alleged, a second [indictment](#) charges CO-CONSPIRATOR ONE and FREEMAN with Conspiracy in the Fourth Degree [1] for buying ghost gun parts and manufacturing weapons from approximately May 14, 2022, to January 13, 2023. According to court documents and statements made on the record, CO-CONSPIRATOR ONE shared 3-D printing files, templates and other information, such as links, with FREEMAN so he could build his own weapons. Several of the links were from the same sources as the other ghost gun conspiracy.

Some of the digital 3-D printing templates sent to FREEMAN were entitled “9mm bullet,” “Glock Auto Switch,” “magazine body,” “Right Side Frame,” and “trigger,” among other files.

In one instance, FREEMAN received a text message from his co-defendant with a zip file that contained a full guide of how to build a “Harlot,” which is a .22 caliber pistol. In another instance, he sent FREEMAN a digital template for a “glock switch,” a gun part that can be 3-D printed and inserted in a semiautomatic firearm to turn it into an automatic machine pistol.

Pandemic Unemployment Assistance Fraud

A third [indictment](#) charges CO-CONSPIRATOR ONE, BAKER, FREEMAN, two additional DHS employees – LATRICIA KITCHENS a/k/a “LATRICIA ODOM,” 36, and GARRET WHETSELL, 38 – and 12 other defendants with Conspiracy in the Fourth Degree [1] for defrauding the Pandemic Unemployment Assistance program. Many of the defendants are also charged with Grand Larceny in the First Degree, among other charges.

According to court documents and statements made on the record, CO-CONSPIRATOR ONE and BAKER – both DHS employees – acted as ringleaders, who in some instances conspired with their coworkers to carry out the alleged conduct.

From approximately April 17, 2020, to October 5, 2021, the defendants stole the personal identifying information of unsuspecting individuals and submitted fraudulent PUA claims to the New York State Department of Labor (“DOL”) in their name and without their knowledge. Once the claims were accepted, DOL issued bank cards to the addresses on the applications. The defendants provided addresses they had access to or control over, including their own home addresses. Eventually, they listed addresses along an Upper East

Side mail route of CO-CONSPIRATOR THREE, a United States Postal Service (USPS) employee. This defendant intercepted the mail and provided the cards to the other defendants to access the stolen funds.

In total, the defendants submitted 170 false applications that netted approximately \$1.2 million in payouts.

Many of the victims were homeless residents who the DHS employees targeted through their positions as DHS employees with access to shelter residents' digital and paper files.

The defendants used the funds to support lavish lifestyles. In particular, BAKER talked about using the money she received to take a trip to Mexico. During the period of the fraud, she took an additional trip to Mexico and a trip to Tanzania.

Many of the defendants in this scheme also worked for other city agencies, including SHANICE ROBERTS, 30, an NYPD School Safety Agent, DAWAYNE BELL, 32, a NYCHA employee, and DAVID BARR, 33 an MTA employee. SABUR KHALIFAH, 43, also worked for the USPS.

Burglary

A fourth [indictment](#) charges BAKER, SAMEERA ROBERTS, 34 and another defendant who has yet to be arraigned, with Burglary in the Second Degree [1] for breaking into CO-CONSPIRATOR ONE'S apartment on November 23, 2020. According to court documents and statement made on the record in court, between November 15, 2020, and November 23, 2020, BAKER sent texts saying she believed CO-CONSPIRATOR ONE was unfairly withholding thousands of dollars of the group's proceeds from PUA fraud and keeping it in a safe in his apartment.

Acknowledgements

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[1] The charges contained in the indictment are merely allegations, and the defendants are presumed innocent unless and until proven guilty. All factual recitations are derived from documents filed in court and statements made on the record in court.