

KTF:RMS
F. #2022R00664


UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Judge Kuntz
Magistrate Judge Levy

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -


JUWAN ANDERSON and
SAY-QUAN POLLACK,
also known as "Say-Quan
Pollock,"

Cr. No. 22-CR-428
(T. 18, U.S.C., §§ 924(c)(1)(A)(i),
924(c)(1)(A)(ii), 924(d)(1), 981(a)(1)(C),
1951(a), 2 and 3551 et seq.; T. 21,
U.S.C., § 853(p); T. 28, U.S.C.,
§ 2461(c))

Defendants.

-----X

THE GRAND JURY CHARGES:

I N T R O D U C T I O N

At all times relevant to this Indictment:

I. Relevant Individuals and Entities

1. The Church was a place of worship that held weekly services in Brooklyn, New York. Parishioners of the Church could attend these services ("Church services") in person or virtually via live-stream. Parishioners of the Church included individuals from other states and other countries. During Church services, the Church solicited donations and collected such payments via a cloud-based online payment system.

2. Individual 1, whose identity is known to the Grand Jury, was the founder and lead pastor of the Church.

3. Individual 2, whose identity is known to the Grand Jury, was the spouse of Individual 1 and a member of the Church clergy.

II. The Robbery

4. On or about July 24, 2022, the defendants [REDACTED], JUWAN ANDERSON and SAY-QUAN POLLACK, also known as “Say-Quan Pollock,” entered the Church brandishing firearms, interrupting Church services while Individual 1 was at the pulpit, Individual 2 was seated nearby, and parishioners watched from the audience within the Church and via the live-stream. [REDACTED] ANDERSON and POLLACK then stole jewelry and personal items from the persons of Individual 1 and Individual 2.

5. As a result of the criminal conduct of the defendants [REDACTED], JUWAN ANDERSON and SAY-QUAN POLLACK, also known as “Say-Quan Pollock,” the Church did not solicit donations on or about July 24, 2022.

COUNT ONE
(Hobbs Act Robbery Conspiracy)

6. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

7. In or about July 2022, within the Eastern District of New York and elsewhere, the defendants [REDACTED], JUWAN ANDERSON and SAY-QUAN POLLACK, also known as “Say-Quan Pollock,” together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of jewelry and personal items from Individual 1 and Individual 2 during Church services.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO
(Hobbs Act Robbery)

8. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

9. On or about July 24, 2022, within the Eastern District of New York and elsewhere, the defendants [REDACTED], JUWAN ANDERSON and SAY-QUAN POLLACK, also known as "Say-Quan Pollock," together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of jewelry and personal items from Individual 1 and Individual 2 during Church services.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT THREE

(Possessing and Brandishing a Firearm During a Crime of Violence)

10. The allegations contained in paragraphs one through five are realleged and incorporated as if fully set forth in this paragraph.

11. On or about July 24, 2022, within the Eastern District of New York and elsewhere, the defendants [REDACTED], JUWAN ANDERSON and SAY-QUAN POLLACK, also known as "Say-Quan Pollock," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crime charged in Count Two, and did knowingly and intentionally possess such firearms in furtherance of such crime of violence, which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNTS ONE AND TWO

12. The United States hereby gives notice to the defendants that, upon their conviction of the offenses charged in Counts One and Two, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property,

real or personal, constituting or derived from proceeds obtained directly or indirectly as a result of such offenses; and (b) 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 violation of any other criminal law of the United States.

13. 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 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT THREE

14. The United States hereby gives notice to the defendants that, upon their conviction of the offense charged in Count Three, 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.

15. 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

[Redacted signature]

FOREPERSON

[Redacted signature]

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK


No. _____

UNITED STATES DISTRICT COURT

EASTERN DISTRICT of NEW YORK
CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

 JUWAN ANDERSON
and SAY-QUAN POLLACK, also known as "Say-Quan Pollock,"
Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 924(d)(1), 981(a)(1)(C),
1951(a), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))



Foreperson

Filed in open court this ----- day,

of ----- A.D. 20 -----

Clerk

Bail, \$ -----

Rebecca Schuman, Assistant U.S. Attorney (718) 254-7202