

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* DECEMBER 20, 2022 *
BROOKLYN OFFICE

RCH:LZ/JML/ADR
F. #2020R00128

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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Judge Nicolas G. Garaufis
Magistrate Judge Peggy Kuo

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

KARIN ROBINSON,

Defendant.

Cr. No. 22-CR-555
(T. 18, U.S.C., §§ 371, 981(a)(1)(C)
and 3551 et seq.; T. 21, U.S.C.,
§§ 841(b)(1)(D), 846, 853(a) and
853(p); T. 28, U.S.C., § 2461(c))

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Conspiracy to Violate the Travel Act)

1. In or about and between February 2019 and June 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KARIN ROBINSON, together with others, did knowingly and willfully conspire to use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of one or more unlawful activities, to wit: Bribe Receiving in the Third Degree, in violation of New York Penal Law Section 200.10, and Bribery in the Third Degree, in violation of New York Penal Law Section 200.00, and thereafter to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on, of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant KARIN ROBINSON, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about March 26, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from an individual whose identity is known to the Grand Jury (“Intermediary-1”).

(b) On or about April 4, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from Intermediary-1.

(c) On or about April 5, 2019, ROBINSON delivered contraband to an individual whose identity is known to the Grand Jury (“Inmate-1”) and who was incarcerated at the George R. Vierno Center (“GRVC”) on Rikers Island.

(d) On or about April 10, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from Intermediary-1.

(e) On or about April 15, 2019, ROBINSON delivered contraband to Inmate-1 at the GRVC on Rikers Island.

(f) On or about April 21, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from Intermediary-1.

(g) On or about May 2, 2019, ROBINSON spoke by telephone with Inmate-1 and discussed contraband smuggling on Rikers Island.

(h) On or about May 8, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from Intermediary-1.

(i) On or about May 17, 2019, ROBINSON received \$1,000 via an electronic Cash App transfer from Intermediary-1.

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

COUNT TWO

(Conspiracy to Distribute and Possess with Intent to Distribute Marijuana)

3. In or about and between February 2019 and June 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KARIN ROBINSON, together with others, did knowingly and intentionally conspire to distribute and possess with intent to distribute a controlled substance, which offense involved a substance containing marijuana, a Schedule I controlled substance, for remuneration, contrary to Title 21, United States Code, Section 841(a)(1).

(Title 21, United States Code, Sections 841(b)(1)(D) and 846; Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION
AS TO COUNT ONE

4. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count One, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which requires any person convicted of such offense to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(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 defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 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 TWO

6. The United States hereby gives notice to the defendant that, upon her conviction of the offense charged in Count Two, the government will seek forfeiture in accordance with Title 21, United States Code, Section 853(a), which requires any person convicted of such offense to forfeit: (a) any property constituting, or derived from, any proceeds obtained directly or indirectly as the result of such offense; and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense.

7. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (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 defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 21, United States Code, Sections 853(a) and 853(p))

A TRUE BILL



FOREPERSON



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.

KARIN ROBINSON,

Defendant.

INDICTMENT

(T. 18, U.S.C. §§ 371, 981(a)(1)(C) and 3551 *et seq.*; T. 21, U.S.C. §§ 841(b)(1)(D), 846, 853(a) and 853(p);
T. 28, U.S.C., § 2461(c))

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Laura Zuckerwise, Joy Lurinsky and Andrew Reich
Assistant U.S. Attorneys
(718) 254-7000

