

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA :

- v. - :

Sealed Indictment

DOMINIC PINEDA and :
SHON MORGAN :

22 Cr. 337

Defendants.

- - - - - X

COUNT ONE
(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. From at least in or about May 18, 2020 to in on or about May 23, 2020 in the Southern District of New York and elsewhere, DOMINIC PINEDA and SHON MORGAN, the defendants, and others known and unknown, unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, PINEDA and MORGAN agreed together and with others to break into a home in Irvington, New York and rob its residents of cash and cryptocurrency.

(Title 18, United States Code, Section 1951).

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, DOMINIC PINEDA and SHON MORGAN, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981 (a) (1) (C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

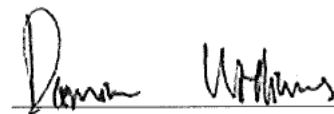
3. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON


DAMIAN WILLIAMS
United States Attorney

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(18 U.S.C. § 1951)

DAMIAN WILLIAMS
United States Attorney


Foreperson
