

IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* OCTOBER 17, 2022 *
BROOKLYN OFFICE

FTB:AFP
F. #2022R00795

Judge Irizarry
Magistrate Judge Bulsara

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

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

22-C R-473
Cr. No. _____
(T. 18, U.S.C., §§ 701, 922(g)(1),
924(a)(2), 924(d)(1), 1017, 2 and 3551 et
seq.; T. 21, U.S.C., § 853(p); T. 28,
U.S.C., § 2461(c))

KARA STERNQUIST,
also known as "Cara Sandiego"
and "Kara Withersea,"

Defendant.

----- X

THE GRAND JURY CHARGES:

COUNT ONE

(Government Seals Wrongfully Procured)

1. In or about and between December 2021 and September 2022, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant KARA STERNQUIST, also known as "Cara Sandiego" and "Kara Withersea," together with others, with knowledge of their fraudulent character, and with wrongful and fraudulent intent, did use, buy and procure instruments, commissions, documents and papers, to which and upon which the seal of a department and agency of the United States had been fraudulently and wrongfully affixed, to wit: badges, personal identity verification ("PIV") cards and credentials for multiple federal law enforcement agencies.

(Title 18, United States Code, Sections 1017, 2 and 3551 et seq.)

COUNT TWO

(Unauthorized Possession of Badges, Identification
Cards and Other Insignia)

2. In or about and between December 2021 and September 2022, both dates being approximate and inclusive, within the Southern District of New York, the defendant KARA STERNQUIST, also known as “Cara Sandiego” and “Kara Withersea,” did knowingly and intentionally possess badges, identification cards and other insignia, and colorable imitations thereof, of the design prescribed by the head of a department and agency of the United States for use by the officers and employees thereof, to wit: badges, PIV cards and credentials for multiple federal law enforcement agencies, without authorization under regulations made pursuant to law.

(Title 18, United States Code, Sections 701 and 3551 et seq.)

COUNT THREE

(Felon in Possession of a Firearm)

3. In or about September 15, 2022, within the Southern District of New York, the defendant KARA STERNQUIST, also known as “Cara Sandiego” and “Kara Withersea,” knowing that she had previously been convicted in a court of a crime punishable by a term of imprisonment exceeding one year, did knowingly and intentionally possess in and affecting commerce a firearm, to wit: a black 9 millimeter pistol.

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

CRIMINAL FORFEITURE ALLEGATION

4. The United States hereby gives notice to the defendant that upon 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.

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 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 U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F.#: 2022R00795
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

KARA STERNQUIST,
also known as "Cara Sandiego" and "Kara Withersea,"

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 701, 922(g)(1), 924(a)(4), 924(d)(1), 1017, 2 and 3551
et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Deighton Reid
Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

F. Turner Buford and Andrés Palacio, Assistant U.S. Attorneys, (718) 254-7000