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U.S. Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 14, 2022

BY ECF

The Honorable Analisa Torres United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Timothy Shea, S1 20 Cr. 412 (AT)

Dear Judge Torres:

The Government writes to notify the Court that on April 14, 2022, a Grand Jury sitting in Manhattan returned a superseding indictment against defendant Timothy Shea in the above-captioned case. Count One of the S1 Indictment charges the defendant with conspiracy to commit wire fraud and private honest services fraud, in violation of 18 U.S.C. § 1349. Count Two of the S1 Indictment charges the defendant with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). Count Three of the S1 Indictment charges the defendant with obstruction of justice through the falsification of documents, in violation of 18 U.S.C. § 1519 and 2. In other words, the S1 Indictment adds a private honest services fraud object to Count One and also adds the offense charged in Count Three. The S1 Indictment has also removed the "speaking" allegations from the original Indictment, so that the new Indictment may be submitted to the jury without redaction.

The Government notified the defendant, through counsel, at least several weeks ago of the possibility of a superseding indictment, including that the superseding indictment was likely to contain the obstruction charge. The changes to the Indictment will not result in the production of any new discovery, and also should have no effect on the estimated length of the trial.

The Government respectfully requests that the Court schedule an arraignment of the defendant, and exclude time on the S1 Indictment from April 14, 2022, to the trial date. The exclusion of time is in the interest of justice so that the defendant has sufficient time to prepare for trial.

Respectfully submitted,

DAMIAN WILLIAMS United States Attorney

By: /s/

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Cc: John C. Meringolo, Esq. (by ECF)