



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.

