

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA : SEALED
: SUPERSEDING
- v. - : INDICTMENT
:
LAWRENCE RAY, : S1 20 Cr. 110
a/k/a "Lawrence Grecco," and :
ISABELLA POLLOK, :
:
Defendants. :
:
- - - - - X

COUNT ONE
(Racketeering Conspiracy)

The Grand Jury charges:

The Enterprise

1. At all times relevant to this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, were members and associates of a criminal organization (the "Enterprise") whose members engaged in, among other things, extortion, sex trafficking, forced labor, money laundering, and obstruction of justice.

2. The Enterprise, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4), that is, a group of individuals associated in fact, although not a legal entity. The Enterprise constituted an ongoing

organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the Enterprise. At all times relevant to this Indictment, the Enterprise was engaged in, and its activities affected, interstate and foreign commerce. The Enterprise operated in the Southern District of New York and elsewhere.

3. LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, participated in the operation of the Enterprise, and participated in unlawful and other activities in furtherance of the conduct of the Enterprise's affairs.

4. LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, was the founder and leader of the Enterprise. During the time period relevant to this Indictment, RAY led the Enterprise and targeted a group of college students and others (the "Victims") for indoctrination and criminal exploitation by the Enterprise. RAY recruited ISABELLA POLLOK, the defendant, and others, known and unknown, to join the criminal scheme and to work on behalf of the Enterprise.

5. During the time period relevant to this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, lived with some of the Victims, first in on-campus housing at a college in Westchester County, New York,

and thereafter at locations in Manhattan, New York; Pinehurst, North Carolina; Piscataway, New Jersey; and elsewhere. Over the course of approximately a decade, between in or about 2010 and in or about 2020, RAY, POLLOK, and others known and unknown, attempted to gain the trust of the Victims before psychologically manipulating and controlling them for the success and furtherance of the Enterprise's ideology and the financial gain of its members. RAY, POLLOK, and others known and unknown, exploited the Victims for the Enterprise's financial gain. RAY, with the assistance of POLLOK and others, subjected the Victims to sexual and psychological manipulation and physical abuse in order, among other things, to extract false confessions from the Victims that they had caused harm and damage to members and associates of the Enterprise, including by poisoning RAY, POLLOK, and others. RAY and POLLOK, and others known and unknown, leveraged the Victims' false confessions to extort money from the Victims, to force some of the Victims to perform unpaid manual labor, and to cause one of the female Victims ("Female Victim-1") to engage in commercial sex acts for the Enterprise's financial benefit.

Purposes of the Enterprise

6. The purposes of the Enterprise included the following:

a. Enriching the members and associates of the Enterprise through, among other things, (1) extortion, (2) sex trafficking, and (3) forced labor;

b. Preserving and protecting the power of the Enterprise, including the power of its leader, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, through violence, threats of violence, and verbal, physical, and mental abuse.

c. Promoting and enhancing the Enterprise and the activities of its members and associates;

d. Protecting the Enterprise and its members and associates from detection and prosecution by law enforcement authorities through acts of intimidation and violence and with threats of retaliation against individuals who witnessed the crimes committed by members and associates of the Enterprise.

Means and Methods of the Enterprise

7. Among the means and methods by which LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, conducted and participated in the conduct of the affairs of the Enterprise were the following:

a. Nurturing the Victims' loyalty to the members and associates of the Enterprise and alienating them from their families;

b. Subjecting the Victims to sexual and psychological manipulation;

c. Physically abusing the Victims, including through acts of violence, threats of violence, food deprivation, and sleep deprivation;

d. Extracting false confessions from the Victims that they had caused harm and damage to members and associates of the Enterprise, such as RAY and POLLOK, including by false confessions that the Victims had poisoned RAY, POLLOK, and others;

e. Documenting and retaining Victims' false confessions, including through video and journals kept by Victims at RAY's direction;

f. Leveraging the Victims' false confessions to extort money from the Victims, to force some of the Victims to perform unpaid manual labor, and to cause one of the female Victims ("Female Victim-1") to engage in commercial sex acts for the Enterprise's financial benefit in New York City and elsewhere;

g. Collecting sensitive, humiliating, and incriminating material against the Victims to further the purposes of the Enterprise, including the continued obedience of the Victims, the enrichment of the Enterprise, and evasion of

detection by law enforcement;

h. Threatening to turn the Victims in to law enforcement in light of their false confessions, which threats were made to further the purposes of the Enterprise, including the continued obedience of the Victims, the enrichment of the Enterprise, and evasion of detection by law enforcement;

i. Pressuring Female Victim-1, through force, threats of force, fraud, and coercion, to engage in frequent prostitution and collecting nearly all the proceeds of that prostitution, amounting to millions of dollars in profits for the Enterprise; and

j. Laundering the proceeds of the Enterprise's criminal activity through various bank accounts and RAY's online domain business.

The Racketeering Conspiracy

8. From at least in or around 2010, up to and including in or around 2020, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, being persons employed by and associated with the Enterprise described in Paragraphs One through Seven of this Indictment, knowingly combined, conspired, confederated, and agreed together and with each other to violate the racketeering laws of the

United States, to wit, Section 1962(c) of Title 18, United States Code, that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of the Enterprise, which was engaged in, and the activities of which affected, interstate and foreign commerce, through a pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and (5), consisting of multiple acts:

a. indictable under Title 18, United States Code, Sections 1951 and 2 (relating to extortion);

b. involving extortion, chargeable under the following provisions of state law, namely, New York Penal Law Sections 155.05(2)(e), 155.40(2) (grand larceny in the second degree by extortion); 155.30(6) (grand larceny in the fourth degree by extortion); 105.10 (conspiracy in the fourth degree); 110.00 (attempt to commit a crime); and 20.00 (accessory liability);

c. indictable under Title 18, United States Code, Sections 1591 and 2 (sex trafficking by force, fraud, or coercion);

d. indictable under Title 18, United States Code, Sections 1589 and 2 (forced labor);

e. indictable under Title 18, United States Code, Sections 1590 and 2 (forced labor trafficking);

f. indictable under Title 18, United States Code, Sections 1952 and 2 (use of interstate commerce to promote unlawful activity);

g. indictable under Title 18, United States Code, Sections 1956 and 2 (relating to the laundering of monetary instruments);

h. indictable under Title 18, United States Code, Sections 1512 and 2 (relating to tampering with a witness, victim, or an informant); and

i. indictable under Title 18, United States Code, Sections 1503 and 2 (relating to obstruction of justice).

9. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the Enterprise.

NOTICE OF SPECIAL SENTENCING FACTOR

10. As part of their agreement to conduct and participate in the conduct of the affairs of the Enterprise through a pattern of racketeering activity, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, agreed that multiple acts indictable under Title 18, United States Code, Section 1591(a) and (b)(1) would be committed, to wit, a conspirator would, in or affecting

interstate commerce, recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, persons, and would benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the persons to engage in commercial sex acts, in violation of Title 18, United States Code, Sections 1591(a) and (b) (1).

(Title 18, United States Code, Section 1962(d).)

COUNT TWO
(Extortion Conspiracy)

The Grand Jury further charges:

11. From in or about 2011, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b) (2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, 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, RAY and POLLOK agreed to extort money from the Victims to repay supposed wrongdoing against RAY and others.

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

COUNT THREE
(Extortion)

The Grand Jury further charges:

12. From in or about 2011, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, knowingly did commit extortion, as that term is defined in Title 18, United States Code, Section 1951(b)(2), by obtaining money and property from and with the consent of another person, which consent would have been and was induced by the wrongful use of actual and threatened force, violence, and fear, 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), and aided and abetted the same, to wit, RAY extorted money from Female Victim-1 to repay supposed wrongdoing against RAY and

others.

(Title 18, United States Code, Sections 1951 and 2.)

COUNT FOUR
(Sex Trafficking)

The Grand Jury further charges:

13. From in or about 2011, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, knowingly, in and affecting interstate and foreign commerce, did recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means a person, and did benefit, financially and by receiving anything of value, from participation in a venture which had engaged in such acts, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as described in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause the person to engage in a commercial sex act, and aided and abetted the same, to wit, RAY engaged in the sex trafficking of Female Victim-1.

(Title 18, United States Code, Sections 1591 and 2.)

COUNT FIVE
(Conspiracy to Commit Sex Trafficking)

The Grand Jury further charges:

14. From in or about 2011, up to and including at

least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, and others known and unknown, knowingly, in and affecting interstate and foreign commerce, did combine, conspire, confederate and agree to recruit, entice, harbor, transport, provide, obtain, advertise, maintain, patronize, and solicit, by any means, a person, and to benefit, financially and by receiving anything of value, from participation in a venture which has engaged in any such act, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause the person to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a) and (b)(1), to wit, RAY and POLLOK, agreed to engage in the sex trafficking of Female Victim-1.

(Title 18, United States Code, Section 1594.)

COUNT SIX
(Forced Labor)

The Grand Jury further charges:

15. From at least in or about May 2013, up to and including at least in or about December 2013, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, knowingly did obtain the labor and services of a person by means of (a) force, threats of

force, physical restraint and threats of physical restraint to her and one or more other persons, (b) serious harm and threats of serious harm to her and one or more other persons, (c) the abuse and threatened abuse of law and legal process, and (d) one or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she and one or more other persons would suffer serious harm and physical restraint, and a combination of such means, and aided and abetted the same, to wit, RAY caused several female Victims to perform physical labor on a property in Pinehurst, North Carolina by among other things, physically harming, threatening, and intimidating the Victims, threatening legal action against them, and convincing those Victims that if they did not perform the labor, those Victims and others would suffer serious harm.

(Title 18, United States Code, Sections 1589 and 2.)

COUNT SEVEN
(Forced Labor Trafficking)

The Grand Jury further charges:

16. From at least in or about May 2013, up to and including at least in or about December 2013, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, knowingly did recruit, harbor, transport, provide, and obtain by any means, persons for labor and services in violation of Title 18, United States Code,

Section 1589(a), and aided and abetted the same, to wit, RAY convinced and caused several female Victims to travel from Manhattan, New York to Pinehurst, North Carolina in order to obtain their physical labor in violation of Title 18, United States Code, Section 1589(a).

(Title 18, United States Code, Sections 1590 and 2.)

COUNT EIGHT
(Forced Labor Conspiracy)

The Grand Jury further charges:

17. From at least in or about May 2013, up to and including at least in or about December 2013, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to provide and obtain the labor and services of one and more persons, by means of (a) force, threats of force, physical restraint and threats of physical restraint to her and one or more other persons, (b) serious harm and threats of serious harm to her and one or more other persons, (c) the abuse and threatened abuse of law and legal process, and (d) one or more schemes, plans and patterns intended to cause her to believe that, if she did not perform such labor and services, she and one or more other persons would suffer serious harm and physical restraint, and a combination of such means, in

violation of Title 18, United States Code, Section 1589(a), to wit, RAY agreed with others to obtain the physical labor of several female Victims on a property in Pinehurst, North Carolina, as described in Count Six of this Indictment and in violation of Title 18, United States Code, Section 1589(a).

(Title 18, United States Code, Section 1594.)

COUNT NINE

(Use of Interstate Commerce To Promote Unlawful Activity)

The Grand Jury further charges:

18. From at least in or about 2014, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, did use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely a business enterprise involving prostitution, and thereafter performed and attempted to perform an act to promote, manage, establish and carry on, and to facilitate the promotion, management, establishment, and carrying on of that unlawful activity, and aided and abetted the same, to wit, RAY used a cellular phone and the Internet, and traveled in interstate commerce, to promote, manage, and carry on a criminal business engaged in sex trafficking and prostitution, and

promoting prostitution, in violation of New York Penal Law Sections 230.00, 230.20, 230.25, 230.30, and 230.32.

(Title 18, United States Code, Sections 1952(a)(3)(B) and 2.)

COUNT TEN

(Use of Interstate Commerce To Promote Unlawful Activity)

The Grand Jury further charges:

19. From at least in or about 2011, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, did use and cause to be used facilities in interstate and foreign commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on of an unlawful activity, namely a business enterprise involving extortion, and thereafter performed and attempted to perform an act to promote, manage, establish, and carry on, and to facilitate the promotion, management, establishment, and carrying on of that unlawful activity, and aided and abetted the same, to wit, RAY used a cellular phone and the Internet, and traveled in interstate commerce, to promote, manage, and carry on extortion, in violation of New York Penal Law Sections 155.30(6) and 20.00.

(Title 18, United States Code, Sections 1952(a)(3)(B) and 2.)

COUNT ELEVEN
(Money Laundering)

The Grand Jury further charges:

20. From at least in or about 2011, up to and including at least in or about 2019, in the Southern District of New York and elsewhere, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, conducted and attempted to conduct such financial transactions, which in fact involved the proceeds of specified unlawful activity, to wit, (i) extortion, in violation of Title 18, United States Code, Section 1951; and (ii) sex trafficking, in violation of Title 18, United States Code, Section 1591, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity, and to avoid a transaction reporting requirement under State and Federal law.

(Title 18, United States Code, Sections 1956(a)(1)(B)(i), (ii),
and 2.)

COUNT TWELVE
(Tax Evasion - 2015 Tax Year)

The Grand Jury further charges:

21. During the calendar year 2015, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, received substantial taxable income, upon which there was substantial income tax due and owing to the United States of America, to wit proceeds of the offenses charged in Counts One through Five of this Indictment. Knowing the foregoing facts and failing to make an income tax return on or before April 15, 2016, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, RAY from in or about January 2015 through on or about April 15, 2016, in the Southern District of New York and elsewhere, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by RAY to the United States of America for calendar year 2015 by various means, including, among others: (a) causing nominees to deposit a substantial part of RAY's unreported income into bank accounts in the nominees' names, including at bank branches and ATMs in the Southern District of New York, and subsequently to transfer the income to RAY through cash and electronic transfers; and (b) using unreported income deposited into bank accounts in the nominees' names to pay for personal expenses, including to purchase

numerous domain names for which RAY was the registrant.

(Title 26, United States Code, Section 7201.)

COUNT THIRTEEN
(Tax Evasion - 2016 Tax Year)

The Grand Jury further charges:

22. During the calendar year 2016, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, received substantial taxable income, upon which there was substantial income tax due and owing to the United States of America, to wit proceeds of the offenses charged in Counts One through Five of this Indictment. Knowing the foregoing facts and failing to make an income tax return on or before April 15, 2017, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, RAY from in or about January 2016 through on or about April 15, 2017, in the Southern District of New York and elsewhere, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by RAY to the United States of America for calendar year 2016 by various means, including, among others: (a) causing nominees to deposit a substantial part of RAY's unreported income into bank accounts in the nominees' names, including at bank branches and ATMs in the Southern District of New York, and subsequently to transfer the income to RAY through cash and electronic transfers; and (b) using

unreported income deposited into bank accounts in the nominees' names to pay for personal expenses, including to purchase numerous domain names for which RAY was the registrant.

(Title 26, United States Code, Section 7201.)

COUNT FOURTEEN
(Tax Evasion - 2017 Tax Year)

The Grand Jury further charges:

23. During the calendar year 2017, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, received substantial taxable income, upon which there was substantial income tax due and owing to the United States of America, to wit proceeds of the offenses charged in Counts One through Five of this Indictment. Knowing the foregoing facts and failing to make an income tax return on or before April 15, 2018, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, RAY from in or about January 2017 through on or about April 15, 2018, in the Southern District of New York and elsewhere, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by RAY to the United States of America for calendar year 2017 by various means, including, among others: (a) causing nominees to deposit a substantial part of RAY's unreported income into bank accounts in the nominees' names, including at bank branches and ATMs in the Southern

District of New York, and subsequently to transfer the income to RAY through cash and electronic transfers; and (b) using unreported income deposited into bank accounts in the nominees' names to pay for personal expenses, including to purchase numerous domain names for which RAY was the registrant.

(Title 26, United States Code, Section 7201.)

COUNT FIFTEEN
(Tax Evasion - 2018 Tax Year)

The Grand Jury further charges:

24. During the calendar year 2018, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, received substantial taxable income, upon which there was substantial income tax due and owing to the United States of America, to wit proceeds of the offenses charged in Counts One through Five of this Indictment. Knowing the foregoing facts and failing to make an income tax return on or before April 15, 2019, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, RAY from in or about January 2018 through on or about April 15, 2019, in the Southern District of New York and elsewhere, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by RAY to the United States of America for calendar year 2018 by various means, including, among others: (a) causing nominees to deposit a substantial part

of RAY's unreported income into bank accounts in the nominees' names, including at bank branches and ATMs in the Southern District of New York, and subsequently to transfer the income to RAY through cash and electronic transfers; and (b) using unreported income deposited into bank accounts in the nominees' names to pay for personal expenses, including to purchase numerous domain names for which RAY was the registrant.

(Title 26, United States Code, Section 7201.)

COUNT SIXTEEN
(Tax Evasion - 2019 Tax Year)

The Grand Jury further charges:

25. During the calendar year 2019, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, received substantial taxable income, upon which there was substantial income tax due and owing to the United States of America, to wit proceeds of the offenses charged in Counts One through Five of this Indictment. Knowing the foregoing facts and failing to make an income tax return on or before July 15, 2020, as required by law, to any proper officer of the Internal Revenue Service, and to pay the income tax to the Internal Revenue Service, RAY from in or about January 2019 through on or about July 15, 2020, in the Southern District of New York and elsewhere, willfully and knowingly did attempt to evade and defeat a substantial part of the income tax due and owing by RAY to the United States of

America for calendar year 2019 by various means, including, among others: (a) causing nominees to deposit a substantial part of RAY's unreported income into bank accounts in the nominees' names, including at bank branches and ATMs in the Southern District of New York, and subsequently to transfer the income to RAY through cash and electronic transfers; and (b) using unreported income deposited into bank accounts in the nominees' names to pay for personal expenses, including to purchase numerous domain names for which RAY was the registrant.

(Title 26, United States Code, Section 7201.)

FORFEITURE ALLEGATION AS TO COUNT ONE

26. As a result of committing the offense alleged in Count One of this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1963, any and all interests the defendant acquired or maintained in violation of Title 18, United States Code, Section 1962; any and all interests in, securities of, claims against, and property or contractual rights of any kind affording a source of influence over, the enterprise named and described herein which the defendants established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962; and any and all

property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity in violation of Title 18, United States Code, Section 1962, the offense alleged in Count One of this Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense alleged in Count One.

FORFEITURE ALLEGATION AS TO COUNTS TWO AND THREE

27. As a result of committing the offenses alleged in Counts Two and Three of this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, 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 that the defendant personally obtained.

28. As a result of committing the offense alleged in Count Two of this Indictment, ISABELLA POLLOK, the defendant, 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 that the defendant personally obtained.

FORFEITURE ALLEGATION AS TO COUNTS FOUR THROUGH EIGHT

29. As a result of committing the offenses alleged in Counts Four, Five, Six, Seven, and Eight of this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594: (1) any property, real and personal, that was involved in, used or intended to be used to commit or to facilitate the commission of the offenses, and any property traceable to such property; and (2) any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property.

30. As a result of committing the offense alleged in Count Five of this Indictment, ISABELLA POLLOK, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 1594: (1) any property, real and personal, that was involved in, used or intended to be used to commit or

to facilitate the commission of the offenses, and any property traceable to such property; and (2) any property, real and personal, constituting or derived from, any proceeds obtained, directly or indirectly, as a result of the offenses, or any property traceable to such property.

FORFEITURE ALLEGATION AS TO COUNT ELEVEN

31. As a result of committing the offense alleged in Count Eleven of this Indictment, LAWRENCE RAY, a/k/a "Lawrence Grecco," and ISABELLA POLLOK, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

32. 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); Title 18, United States Code, Section 1963(m); 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, Sections 981, 982, and 1963; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON



AUDREY STRAUSS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

LAWRENCE RAY,
a/k/a "Lawrence Grecco," and
ISABELLA POLLOK,

Defendants.

SEALED
SUPERSEDING INDICTMENT

S1 20 Cr. 110

(18 U.S.C. §§ 1962, 1951, 1591, 1589, 1590, 1594, 1952, 1956,
and 2; 26 U.S.C. § 7201.)

AUDREY STRAUSS
United States Attorney

A TRUE BILL

Foreperson

[Handwritten Signature]