

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	SUPERSEDING
	:	<u>INFORMATION</u>
- v. -	:	
	:	S3 20 Cr. 110 (LJL)
ISABELLA POLLOK,	:	
	:	
Defendant.	:	
	:	
-----X	:	

COUNT ONE

(Money Laundering Conspiracy)

The United States Attorney charges:

1. 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, ISABELLA POLLOK, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, money laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

2. It was a part and object of the conspiracy that ISABELLA POLLOK, the defendant, and others known and unknown, knowing that the property involved in certain financial transactions represented the proceeds of some form of unlawful activity, would and did conduct and attempt 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.

Overt Act

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about October 16, 2018, less than one day after POLLOK accompanied LAWRENCE RAY to a hotel in midtown Manhattan and observed RAY suffocate Female Victim-1 with a plastic bag, POLLOK collected \$8,740 in extortion and sex trafficking proceeds from Female Victim-1.

b. Between on or about October 18, 2018 and on or about October 23, 2018, POLLOK deposited approximately \$6,500 of extortion and sex trafficking proceeds from Female Victim-1 into a bank account in POLLOK's name in order to conceal and disguise the nature, source, ownership, and control of the proceeds.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, 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.

Substitute Assets Provision

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 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 defendant 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.)



DAMIAN WILLIAMS
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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(Title 18, United States Code, Section
371.)

DAMIAN WILLIAMS
United States Attorney.
