

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA : Hon.
: :
v. : Crim. No.
: :
SHANILE LYLE : 18 U.S.C. § 1960

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

1. Defendant SHANILE LYLE ("LYLE"), a resident of New Jersey, received checks for hundreds of thousands of dollars from a scheme in which victims were falsely told that they had won large sums of money in a lottery sweepstakes and had to pre-pay taxes on their winnings. These victims were directed to send checks to cover the purported amounts due and owing.

2. LYLE deposited these checks into bank accounts that she controlled and then transmitted the bulk of the funds that she received, less LYLE's fee, to others, including recipients overseas.

3. LYLE knew that the above-described funds had been derived from a criminal offense, namely, the scheme described in Paragraph 1 of this Information.

4. In or around 2018, in Essex County, in the District of New Jersey and elsewhere, the defendant,

SHANILE LYLE

did knowingly conduct, control, manage, supervise, direct, and own all or part of an unlicensed money transmitting business, as defined in Title 18, United States Code, Section 1960(b)(1), which affected interstate commerce and foreign commerce and involved the transportation or transmission of funds that were known to the defendant to have been derived from a criminal offense.

In violation of Title 18, United States Code, Section 1960(a).

FORFEITURE ALLEGATION

1. As a result of committing the offense in violation of 18 U.S.C. § 1960, as charged in this Information, the defendant,

SHANILE LYLE,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(1), all property, real and personal, constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in this Information.

2. If by any act or omission of the defendant any property subject to forfeiture described above:

- (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,

the United States of America shall be entitled, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to the forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.



Philip R. Sellinger
PHILIP R. SELLINGER
United States Attorney