

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x
:
UNITED STATES OF AMERICA
:
- v. -
:
GEORGE SQUIRE,
a/k/a Geo,"
:
Defendant.
:
- - - - - x

~~SEAL~~
INDICTMENT

12 Cr.

12 CRIM 00680

COUNT ONE

The Grand Jury charges:

1. On or about March 24, 2012, in the Southern District of New York, GEORGE SQUIRE, a/k/a "Geo," the defendant, unlawfully and knowingly did commit and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, at 5 City Terrace, Newburgh, New York, SQUIRE robbed at gunpoint an individual who possessed purple haze marijuana and money.

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

COUNT TWO

The Grand Jury further charges:

2. On or about March 24, 2012, in the Southern District of New York, GEORGE SQUIRE, a/k/a "Geo," the defendant,

willfully and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the robbery described in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and in the course thereof did cause the death of a person through the use of a firearm, which killing is murder as defined in Title 18, United States Code, Section 1111(a), to wit, SQUIRE caused the death of Tomas Almodovar by discharging a firearm at Tomas Almodovar, in the vicinity of 5 City Terrace, Newburgh, New York.

(Title 18, United States Code, Section 924(j)(1).)

FORFEITURE ALLEGATION

3. As the result of committing the offense charged in Count One of this Indictment, in violation of Title 18, United States Code, Section 1951, GEORGE SQUIRE, a/k/a "Geo," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offense alleged in Count One of this Indictment, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense.

Substitute Assets Provision

4. If any of the property described above as being subject to forfeiture, 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 18 U.S.C. § 981, 21 U.S.C. § 853(p), and 28 U.S.C. § 2461, to seek forfeiture of any other property of the defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981 and 1951;
Title 28, United States Code, Section 2461; and
Title 21, United States Code, Section 853.)


SPECIAL FINDINGS AS TO GEORGE SQUIRE


5. As to Count Two of the Indictment, alleging the murder of Tomas Almodovar, GEORGE SQUIRE, a/k/a "Geo," the defendant:

- a. was 18 years of age or older at the time of the offense;

- b. intentionally killed the victim;
- c. intentionally inflicted serious bodily injury that resulted in the death of the victim;
- d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and the victim died as a direct result of the act; and
- e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and the victim died as a direct result of the act.

(Title 18, United States Code, Section 3591(a)(2).)


FOREPERSON


PREET BHARARA
United States Attorney