

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
:
UNITED STATES OF AMERICA :
:
- v. - :
:
CHRISTOPHER MULLIGAN, :
:
Defendant. :
:
- - - - - X

SEALED INDICTMENT
16 CRIM 544
16 Cr.

COUNT ONE

(Conspiracy to Commit Hobbs Act Robbery)

The Grand Jury charges:

1. In or about May 2015, in the Southern District of New York and elsewhere, CHRISTOPHER MULLIGAN, the defendant, and others known and unknown unlawfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), 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, MULLIGAN and others known and unknown agreed to rob employees of a watch business located in the vicinity of Madison Avenue in New York, New York (the "Watch Business") of monies and goods that travel in interstate commerce.

OVERT ACT

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

a. On or about May 12, 2015, CHRISTOPHER MULLIGAN, the defendant, entered the Watch Business and used force to take watches from the Watch Business.

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

COUNT TWO

(Hobbs Act Robbery)

The Grand Jury further charges:

3. On or about May 12, 2015, in the Southern District of New York and elsewhere, CHRISTOPHER MULLIGAN, the defendant, and others known and unknown willfully and knowingly did 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, MULLIGAN and others known and unknown committed an armed robbery of the Watch Business, which operates in interstate commerce.

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

COUNT THREE

(Firearms Offense)

The Grand Jury further charges:

4. On or about May 12, 2015, in the Southern District of New York, CHRISTOPHER MULLIGAN, the defendant, 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 charged in Count Two of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of a firearm, which was discharged.

(Title 18, United States Code, Sections 924(c)(1)(A)(iii)

and 2.)

FORFEITURE ALLEGATION

5. As a result of committing the robbery offenses alleged in Counts One and Two of this Indictment, CHRISTOPHER MULLIGAN, 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, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses alleged in Counts One and Two of this Indictment.

Substitute Assets Provision

6. 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 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

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

FOREPERSON


Preet Bharara
PREET BHARARA *RK*
United States Attorney

