

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

SEALED INDICTMENT

- v. -

17 Cr.

ALGI CRAWFORD,  
a/k/a "G Mo," and  
JONATHAN GRIFFIN,  
a/k/a "Old Fifty,"

17 CRIM 609

Defendants.

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COUNT ONE

(Bank Fraud Conspiracy)

The Grand Jury charges:

1. From at least in or about May 2017, up to and including June 2017, in the Southern District of New York and elsewhere, ALGI CRAWFORD, a/k/a "G Mo," and JONATHAN GRIFFIN, a/k/a "Old Fifty," the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit bank fraud, in violation of Title 18, United States Code, Section 1344.

2. It also was a part and an object of the conspiracy that ALGI CRAWFORD, a/k/a "G Mo," and JONATHAN GRIFFIN, a/k/a "Old Fifty," the defendants, and others known and unknown, willfully and knowingly, would and did execute and attempt to execute a scheme or artifice to defraud a financial

institution, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1344.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Bank Fraud)

The Grand Jury further charges:

3. From at least in or about May 2017, up to and including June 2017, in the Southern District of New York and elsewhere, ALGI CRAWFORD, a/k/a "G Mo," and JONATHAN GRIFFIN, a/k/a "Old Fifty," the defendants, willfully and knowingly, did execute and attempt to execute a scheme or artifice to defraud a financial institution, the deposits of which were then insured by the FDIC, and to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of a financial institution, by means of false and fraudulent pretenses, representations, and promises, and aided and abetted the same, to wit, CRAWFORD and GRIFFIN made false

representations to a financial institution in the course of depositing a stolen check.

(Title 18, United States Code, Sections 1344 and 2.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offenses alleged in Counts One and Two of this Indictment, ALGI CRAWFORD, a/k/a "G Mo," and JONATHAN GRIFFIN, a/k/a "Old Fifty," the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2), all property that constitutes, or is derived from, proceeds obtained directly or indirectly as a result of said offenses, including but not limited to a sum of money representing the amount of proceeds obtained directly or indirectly as a result of said offenses.

**Substitute Assets Provision**

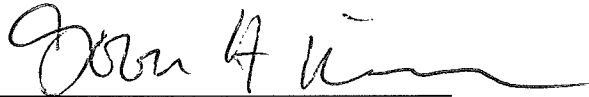
5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
- a) cannot be located upon the exercise of due diligence;
  - b) has been transferred or sold to, or deposited with, a third person;
  - c) has been placed beyond the jurisdiction of the court;
  - 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), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982(a)(2);  
Title 21, United States Code, Section 853(p).)

  
Foreperson

  
JOON H. KIM  
Acting United States Attorney

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

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(18 U.S.C. §§ 1344, 1349, and 2.)

JOON H. KIM

Acting United States Attorney.

A TRUE BILL

  
Foreperson.

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