

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:   
UNITED STATES OF AMERICA :   
:   
- v. - : Indictment   
:   
KYMAHLI LYSIUS, : 21 Cr.   
:   
:   
Defendant. :   
:   
- - - - - X

**COUNT ONE**  
**(Hobbs Act Robbery)**

The Grand Jury charges:

1. On or about August 6, 2020, in the Southern District of New York and elsewhere, KYMAHLI LYSIUS, the defendant, 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, LYSIUS robbed a livery cab at gunpoint in the vicinity of West 151st Street in New York, New York.

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

**COUNT TWO**  
**(Hobbs Act Robbery)**

The Grand Jury further charges:

2. On or about August 7, 2020, in the Southern District

of New York and elsewhere, KYMAHLI LYSIUS, the defendant, 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, LYSIUS robbed a livery cab at gunpoint in the vicinity of West 153rd Street in New York, New York.

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

**COUNT THREE**  
**(Firearms Use, Carrying, and Possession)**

The Grand Jury further charges:

3. On or about August 6, 2020, in the Southern District of New York and elsewhere, KYMAHLI LYSIUS, 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 One 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 brandished during the robbery charged in Count One of this Indictment.

(Title 18, United States Code, Sections 924(c)(1)(A)(i),  
(ii), and 2.)

**COUNT FOUR**  
**(Firearms Use, Carrying, and Possession)**

The Grand Jury further charges:

4. On or about August 7, 2020, in the Southern District of New York and elsewhere, KYMAHLI LYSIUS, 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 brandished during the robbery charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 924(c)(1)(A)(i),  
(ii), and 2.)

**FORFEITURE ALLEGATIONS**

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, KYMAHLI LYSIUS, 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 offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

6. As a result of committing the offenses alleged in Counts Three and Four of this Indictment, KYMAHLI LYSIUS, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28 United States Code, Section 2461(c), any and all firearms and ammunition involved in or used in said offenses.

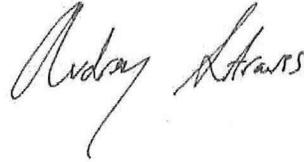
**Substitute Assets Provision**

7. 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, Sections 924 and 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

A handwritten signature in cursive script that reads "Audrey Strauss".

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AUDREY STRAUSS  
Acting United States Attorney

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

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

KYMAHLI LYSIUS,

Defendant.

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INDICTMENT

21 Cr.

(18 U.S.C. §§ 1951, 924(c)(1)(A)(i),  
924(c)(1)(A)(ii), and 2.)

AUDREY STRAUSS

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Acting United States Attorney

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