

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X  
:   
UNITED STATES OF AMERICA : SEALED INDICTMENT  
:   
- v. - : 21 Cr.  
:   
JASMIN REED, :   
:   
Defendant. :   
:   
- - - - - X

COUNT ONE  
(Conspiracy)

The Grand Jury charges:

1. The charges set forth herein arise from a scheme whereby JASMIN REED, the defendant, while employed as an exterminator by the New York City Department of Correction ("DOC"), smuggled narcotics and other contraband into a DOC jail, in exchange for cash bribes.
2. Specifically, from at least in or about September 2019 up through and including in or about December 2019, JASMIN REED, the defendant, introduced or attempted to introduce marijuana; smokable synthetic cannabinoids, often referred to as "K2" or "Spice"; a razor; cigarettes; and other contraband to inmates ("Inmate-1" and "Inmate-2") in the Manhattan Detention Complex ("MDC"), a DOC jail in downtown Manhattan. In return, REED received cash payments from a relative and associates of Inmate-1 and Inmate-2.

3. Beginning in or about September 2019, Inmate-1 and Inmate-2 placed telephone calls to their respective associates, and instructed those associates to drop off contraband with a certain individual. In turn, an associate of Inmate-1 and Inmate-2 ("Associate-1") sent a \$500 Cash App payment, as well as an accompanying message referencing Inmate-1 and Inmate-2, to JASMIN REED, the defendant. Cash App is a smartphone application that permits users to transfer funds and accompanying messages.

4. To facilitate the introduction of contraband and discuss payment terms, JASMIN REED, the defendant, also communicated by text message with a sibling of Inmate-1 ("Sibling-1"). For example:

a. On or about November 22, 2019, Sibling-1 sent the following text messages to REED: "[Inmate-1] said to reach out . . . He needs another phone and some more supply."

b. On or about December 4, 2019, REED sent the following text message to Sibling-1: "Did [Inmate-1] tell you how much to cash app me?"

5. As an exterminator employed by the DOC, JASMIN REED, the defendant, could access the MDC without being escorted by a correction officer or other official. On at least five occasions, REED used that access to deliver contraband for Inmate-1 and Inmate-2, including to the cell of Inmate-1.

6. On at least one occasion, JASMIN REED, the defendant, smuggled a cellphone into the MDC for Inmate-1 ("Cellphone-1"). Thereafter, REED and Inmate-1 communicated directly on Cellphone-1 over 250 times.

7. On or about December 6, 2019, JASMIN REED, the defendant, attempted to enter the MDC with a black plastic bag containing a single-edged razor, K2, marijuana, tobacco, and other contraband, for Inmate-1. To evade detection, REED sought to enter the MDC through a side entrance.

8. At all times relevant to this Indictment, JASMIN REED, the defendant, was employed as an exterminator at the MDC. DOC employees, including REED, receive training on employee rules and regulations, which prohibit employees from, among other things, entering into transactions with inmates and providing inmates with contraband.

#### Statutory Allegations

9. From at least in or around September 2019, up through and including in or around December 2019, in the Southern District of New York and elsewhere, JASMIN REED, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit: (1) honest services wire fraud, in violation of Title 18, United States Code, Sections 1343 and 1346; and (2) distribution of a

controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

10. It was a part and an object of the conspiracy that JASMIN REED, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to deprive her employer of the right to her honest services, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Sections 1343 and 1346.

11. It was further a part and an object of the conspiracy that JASMIN REED, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

Overt Act

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

a. On or about September 23, 2019, Associate-1 paid a cash bribe to JASMIN REED, the defendant, in exchange for

smuggling contraband into the MDC for Inmate-1 and Inmate-2.

(Title 18, United States Code, Section 371.)

**COUNT TWO**  
**(Honest Services Wire Fraud)**

The Grand Jury further charges:

13. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth herein.

14. From at least in or about September 2019 up through and including in or about December 2019, in the Southern District of New York and elsewhere, JASMIN REED, the defendant, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and to deprive her employer of its intangible right to her honest services, did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, Associate-1 and Sibling-1 paid REED over \$1,500 in bribes, in exchange for which REED introduced contraband into the MDC, and facilitated those exchanges through telephone calls in interstate commerce.

(Title 18, United States Code, Sections 1343, 1346, and 2.)

COUNT THREE  
(Distribution of a Controlled Substance)

The Grand Jury further charges:

15. The allegations contained in paragraphs 1 through 8 of this Indictment are repeated and realleged as if fully set forth herein.

16. On or about December 16, 2019, in the Southern District of New York and elsewhere, JASMIN REED, the defendant, intentionally and knowingly distributed and possessed with intent to distribute a controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

17. The controlled substance involved in the offense was mixtures and substances containing a detectable amount of methyl 2-(1-(5-fluoropentyl)-1H-indole-3-carboxamido)-3,3-dimethylbutanoate (known as "5F-MDMB-PICA"), a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C); Title 18, United States Code, Section 2.)

FORFEITURE ALLEGATIONS

18. As a result of committing the honest services wire fraud object of the conspiracy alleged in Count One of this Indictment, as well as the offense alleged in Count Two of this Indictment, JASMIN REED, 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.

19. As a result of committing the narcotics offense object of the conspiracy alleged in Count One of this Indictment, as well as the offense alleged in Count Three of this Indictment, JASMIN REED, the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate 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.

Substitute Assets Provision

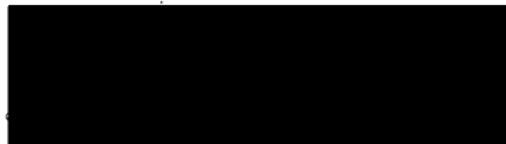
20. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- 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 the defendant up to the value of the above 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

*Audrey Strauss*  
AUDREY STRAUSS  
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.

JASMIN REED

Defendant.

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INDICTMENT

21 Cr.

(18 U.S.C. §§ 2, 371, 1343, 1346; 21  
U.S.C. § 841)

AUDREY STRAUSS

United States Attorney

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Foreperson

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