

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X
UNITED STATES OF AMERICA :
 :
 - v. - : SEALED INDICTMENT
 :
 MATTHEW DUSABLON, : 21 Cr. 628 ()
 a/k/a "Mateo," :
 a/k/a "Murk," and :
 JAHAIIRA MEJIA, :
 :
 Defendants. :
- - - - - X

COUNT ONE
(Hobbs Act Robbery Conspiracy)

The Grand Jury charges:

1. In or about December 2020, in the Southern District of New York and elsewhere, MATTHEW DUSABLON, a/k/a "Mateo," a/k/a "Murk", and JAHAIIRA MEJIA, the defendants, and others known and unknown, 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, DUSABLON, MEJIA, and at least three other individuals conspired to rob a drug dealer at gunpoint in the vicinity of Ossining, New York.

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

COUNT TWO
(Hobbs Act Robbery)

The Grand Jury further charges:

2. On or about December 6, 2020, in the Southern District of New York and elsewhere, MATTHEW DUSABLON, a/k/a "Mateo," a/k/a "Murk", and JAHAIIRA MEJIA, the defendants, knowingly committed 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), and did aid and abet the same, to wit, DUSABLON, MEJIA, and at least three other individuals robbed a drug dealer at gunpoint in the vicinity of Ossining, New York.

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

COUNT THREE
(Firearms Offense)

The Grand Jury further charges:

3. On or about December 6, 2020, in the Southern District of New York and elsewhere, MATTHEW DUSABLON, a/k/a "Mateo," a/k/a "Murk", and JAHAIIRA MEJIA, the defendants, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the Hobbs Act robbery charged in Count Two of this Indictment, knowingly did 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.

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

COUNT FOUR
(Obstruction of Justice)

The Grand Jury further charges:

4. From in or about late 2020 through in or about early 2021, in the Southern District of New York and elsewhere, MATTHEW DUSABLON, a/k/a "Mateo," a/k/a "Murk", and JAHAIIRA MEJIA, the defendants, corruptly obstructed, influenced, and impeded an official proceeding, and attempted to do so, to wit, DUSABLON and MEJIA concealed a jacket that a co-conspirator was wearing on or about December 6, 2020 and deleted information from their cell phones and social media accounts, and DUSABLON directed a co-conspirator to erase information from the co-conspirator's cell phone and social media accounts, all to impede and obstruct the federal investigation of the Hobbs Act robbery conspiracy charged in Count One of this Indictment and the Hobbs Act robbery charged in Count Two of this Indictment.

(Title 18, United States Code, Section 1512(c)(2).)

FORFEITURE ALLEGATIONS

5. As a result of committing the offenses alleged in Counts One and Two of this Indictment, MATTHEW DUSABLON, a/k/a "Mateo," a/k/a "Murk", and JAHAIIRA MEJIA, the defendants, 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.

Substitute Asset Provision

6. 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 18, United States Code, Section 1963(m), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853;
Title 18, United States Code, Section 1963.)

FOREPERSON

Damian Williams

DAMIAN WILLIAMS
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MATTHEW DUSABLON,
a/k/a "Mateo," a/k/a "Murk," and JAHAIIRA MEJIA,

Defendants.

SEALED INDICTMENT

21 Cr.

(Title 18, United States Code, Sections
1951, 924(c), 1512(c)(2), and 2.)

DAMIAN WILLIAMS
United States Attorney


Foreperson
