

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :
:
- v. - :
:
ALONZO KNOWLES, :
a/k/a "Jeff Moxey," :
:
Defendant. :
----- X

INDICTMENT

16 CRIM 005

COUNT ONE

(Criminal Copyright Infringement)

The Grand Jury charges:

1. On or about December 21, 2015, in the Southern District of New York and elsewhere, ALONZO KNOWLES, a/k/a "Jeff Moxey," the defendant, unlawfully, willfully, and knowingly did infringe copyrights for purposes of commercial advantage and private financial gain by the reproduction and distribution, including by electronic means, during a 180-day period, of ten and more copies and phonorecords, of one and more copyrighted works, which had a total retail value of more than \$2,500, to wit, without authorization, KNOWLES distributed copies of at least ten copyrighted scripts of movies and television shows, which have not yet been publicly released, to an undercover law

JUDGE ENGELMAYER

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enforcement agent in exchange for \$80,000 in New York, New York.

(Title 17, United States Code, Section 506(a)(1)(A) and Title 18, United States Code, Section 2319(b)(1).)

COUNT TWO

(Identity Theft)

The Grand Jury further charges:

2. From on or about December 15, 2015, up to and including on or about December 21, 2015, in the Southern District of New York and elsewhere, ALONZO KNOWLES, a/k/a "Jeff Moxey," the defendant, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person with the intent to commit, and to aid and abet, and in connection with, unlawful activity that constitutes a violation of Federal law, and that constitutes a felony under applicable State and local law, to wit, KNOWLES transferred Social Security numbers, driver's license numbers, a passport number, dates of birth, and a bank account number belonging to other individuals to an undercover law enforcement agent located in New York, New York, which information KNOWLES obtained from gaining unauthorized access to the computers of those individuals, in violation of Title 18, United States Code,

Section 1030(a)(2).

(Title 18, United States Code, Section 1028(a)(7).)

FORFEITURE ALLEGATIONS

3. As a result of committing the criminal copyright infringement offense alleged in Count One of this Indictment, ALONZO KNOWLES, a/k/a "Jeff Moxey," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 2323(b), all articles made or trafficked as part of the commission of the offense; all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of offense; and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the commission of the offense, including, but not limited to, United States currency representing the amount of proceeds obtained directly or indirectly as a result of the commission of the offense alleged in Count One.

4. As the result of committing the identity theft offense alleged in Count Two of this Indictment, ALONZO KNOWLES, a/k/a "Jeff Moxey," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b), all property constituting, or derived from, proceeds obtained directly or indirectly as a result of the offense and all personal property used or intended to be used to commit the offense, including, but not limited to, United States

currency representing the amount of proceeds obtained directly or indirectly as a result of the offense alleged in Count Two.

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) 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 17, United States Code, Section 506; Title 18, United States Code, Sections 982, 1028, 2319, and 2323; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



FOREPERSON

A handwritten signature in cursive script that reads "Preet Bharara".

PREET BHARARA *NF*

United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

ALONZO KNOWLES,
a/k/a "Jeff Moxey,"

Defendant.

INDICTMENT

(17 U.S.C. § 506;
18 U.S.C. §§ 1028, 2319)



Foreperson.

PREET BHARARA

United States Attorney.

*1/5/16 - Filed Indictment
Case assigned to J Englmayer.
J Peak
usma*