RCH:ADW/ADG
F. #2025R00127

FILED
IN CLERK'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.
* JUNE 9, 2026 *
BROOKLYN OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
- X

UNITED STATES OF AMERICA

- against -

LATANYA BROWN,

Defendant.

- X

INDICTMENT

Cr. No. 26-CR-168
(T. 18, U.S.C., §§ 666(a)(1)(A), 1951, 1952(a)(3)(A), 981(a)(1)(C), 2 and 3551 et seq.; T. 21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

Judge Margo K. Brodie
Magistrate Judge Peggy Cross-Goldenberg

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. Background

1. The New York City Department of Correction ("DOC") managed all New York City jails, including Rikers Island. The DOC received benefits in excess of $10,000 per year under various federal government programs.

2. As set forth in their union contracts and as required under federal and state law, DOC officers and employees were paid overtime at 50% above their normal pay if they worked more than 40 hours per week. DOC officers had the option of being compensated by either cash payment or compensatory time off. All DOC officers had to sign and submit forms when requesting overtime shifts and verifying their overtime hours, and these submissions had to be approved by a DOC supervisor.

3. The defendant LATANYA BROWN was a resident of Bronx County, New York. BROWN was employed by the DOC since approximately October 2001. Since

approximately July 2007, BROWN held the rank of DOC captain. Between approximately January 2024 and July 2024, BROWN was assigned to Rikers Island's Otis Bantum Correctional Center as a DOC supervisor. Between approximately July 2024 and November 2025, BROWN was assigned to Rikers Island's Facility Operations Department ("Facility Operations") as a DOC supervisor. Between approximately November 2025 and December 2025, BROWN was assigned to New York State courthouses located in Bronx County.

4. John Doe 1 and John Doe 2, individuals whose identities are known to the Grand Jury, were correctional officers supervised by the defendant LATANYA BROWN in Facility Operations.

II. The Extortion Scheme

5. As a DOC supervisor in Facility Operations, the defendant LATANYA BROWN was responsible for approving the schedules of other DOC employees, including John Doe 1 and John Doe 2, who worked in Facility Operations, including regular shifts, overtime shifts and vacation time.

6. As a condition of approving employee requests for shift schedule changes, overtime shifts and vacation time, the defendant LATANYA BROWN regularly forced other DOC employees, including John Doe 1 and John Doe 2, to pay her money, purchase luxury items for her, or perform services for her such as driving BROWN to restaurants, bars, personal appointments and a casino, often during times when BROWN was officially on duty. Between July 2024 and November 2025, BROWN forced DOC employees, including John Doe 1 and John Doe 2, to pay her thousands of dollars in money and in-kind personal services.

7. Using her official position and authority as a DOC captain and DOC supervisor, the defendant LATANYA BROWN made both implicit and explicit threats to

demand that DOC officers who reported to BROWN, including John Doe 1 and John Doe 2, provide her with payments, luxury items and personal services. The DOC officers that reported to BROWN feared that if they refused BROWN's demands, BROWN would use her official position and authority to negatively affect the DOC officers' duties and assignments, including by reassigning officers to less desirable posts and denying regular shift change requests, overtime shift requests and vacation time requests.

8. For example, in or about December 2024, the defendant LATANYA BROWN asked several DOC officers, including John Doe 1 and John Doe 2, to collectively purchase a particular Louis Vuitton bag for her. When BROWN made her request, she made statements to the DOC officers implying, in sum and substance, that their shift assignments, overtime shifts and vacation time would be in jeopardy unless they purchased the Louis Vuitton bag. DOC employees, including John Doe 1 and John Doe 2, purchased the bag BROWN requested.

9. When DOC employees, including John Doe 1 and John Doe 2, made the demanded payments to the defendant LATANYA BROWN, they usually paid in cash or used the peer-to-peer payment application known as Zelle. DOC employees also communicated with BROWN and with each other regarding the payments and the luxury item purchases via cell phone text messages.

III. <u>The Regular Wage and Overtime Fraud Scheme</u>

10. In 2024, the defendant LATANYA BROWN received a base salary of approximately $125,855 per year as a DOC employee. That year, BROWN also received more than $231,000 in overtime wages as a DOC employee.

11. In 2025, the defendant LATANYA BROWN received a base salary of approximately $130,260 per year as a DOC employee. That year, BROWN also received more than $178,000 in overtime wages as a DOC employee.

12. For both 2024 and 2025, the defendant LATANYA BROWN routinely claimed that she worked hours during regular shifts and overtime shifts that she had not actually worked. Instead, on more than 100 occasions, BROWN arrived at her assigned posting several hours late or left several hours early but later submitted documentation falsely stating that she had worked the full shift. Based on these false submissions, BROWN fraudulently obtained thousands of dollars in regular and overtime wages.

13. For example, on or about February 16, 2024, the defendant LATANYA BROWN claimed in documentation submitted to the DOC to have worked from 5:00 a.m. until 7:31 p.m. on Rikers Island. However, BROWN did not arrive at Rikers Island that day until approximately 12:49 p.m. Similarly, on or about April 23, 2024, BROWN claimed in documentation submitted to the DOC to have worked from 5:00 a.m. until 9:31 p.m. on Rikers Island. But BROWN did not arrive at Rikers Island that day until approximately 1:09 p.m. Nevertheless, in both cases, BROWN was compensated by the DOC as if she had worked her full shift and at least six hours of overtime.

14. On some occasions, when the defendant LATANYA BROWN left her assigned posting early, she did so to spend time at the Empire City Casino in Yonkers, New York. For instance, on or about November 21, 2024, BROWN claimed in documentation submitted to the DOC to have worked from 5:00 a.m. until 9:31 p.m. on Rikers Island. However, BROWN was not at Rikers Island during the entirety of that shift and instead arrived

at the Empire City Casino that day at approximately 2:34 p.m. Nevertheless, BROWN was compensated by the DOC as if she had worked her full shift and at least seven hours of overtime.

COUNT ONE
(Hobbs Act Extortion)

15. The allegations contained in paragraphs one through 14 are realleged and incorporated as if fully set forth in this paragraph.

16. In or about and between July 2024 and November 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LATANYA BROWN did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce, by extortion, in that BROWN obtained and attempted to obtain property, to wit: United States currency and other forms of payment, from John Doe 1, John Doe 2 and other DOC employees, individuals whose identities are known to the Grand Jury, with their consent, which consent was induced under color of official right, to wit: BROWN's position as a captain and supervisor within the DOC.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO
(Use of Interstate Facilities to Commit Extortion)

17. The allegations contained in paragraphs one through 14 are realleged and incorporated as if fully set forth in this paragraph.

18. In or about and between July 2024 and November 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LATANYA BROWN did knowingly and intentionally use one or more facilities in interstate and foreign commerce with intent to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of one or more unlawful activities, to

wit: Grand Larceny in the Second Degree, in violation of New York Penal Law Section 155.40(2), and thereafter performed and attempted to perform acts to promote, manage, establish, carry on and facilitate the promotion, management, establishment and carrying on of such unlawful activity.

(Title 18, United States Code, Sections 1952(a)(3) and 3551 et seq.)

COUNT THREE
(Theft From Agency Receiving Federal Funds)

19. The allegations contained in paragraphs one through 14 are realleged and incorporated as if fully set forth in this paragraph.

20. In or about and between January 2024 and December 2025, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant LATANYA BROWN, together with others, while an agent of an agency of a local government, to wit: the DOC, did knowingly and intentionally embezzle, steal, obtain by fraud, misapply and otherwise without authority convert to the use of a person other than the rightful owner, property of the DOC, which received, in one or more one year periods, benefits in excess of $10,000 under one or more Federal programs involving grants, contracts, subsidies, loans, guarantees, insurance and other forms of Federal assistance, which property was valued at $5,000 or more, and was owned by, and was under the care, custody and control of, the DOC, to wit: DOC funds.

(Title 18, United States Code, Sections 666(a)(1)(A), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

21. The United States hereby gives notice to the defendant that, upon her conviction of any of the offenses charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States

Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, which constitutes, or is derived from, proceeds traceable to such offenses.

22. 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 party;

(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 divided 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 forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

[redacted]

FOREPERSON

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UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK