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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Garbis Aram Krajekian,
Defendant.

NO: CR-14-1245-PHX-GMS (BSB)

INDICTMENT

VIO: 18 U.S.C. § 371
(Conspiracy)
Count 1

18 U.S.C. § 1956(h)
(Conspiracy to Launder Monetary
Instruments)
Count 2

18 U.S.C. § 472
(Uttering Counterfeit Obligations
or Securities)
Counts 3-23

18 U.S.C. § 492
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(2)(B)
28 U.S.C. § 2461
Forfeiture Allegation

THE GRAND JURY CHARGES:

At all times material to this indictment, within the District of Arizona and elsewhere:

1. Defendant GARBIS ARAM KRAJEKIAN (“KRAJEKIAN”) was an Arizona resident. KRAJEKIAN currently lives in Chandler, Arizona.

FEDERAL RESERVE NOTES

2. The United States Department of the Treasury, through the Bureau of Engraving and Printing (“BEP”), develops and produces United States currency notes. As its primary function, the BEP oversees the production of billions of dollars in Federal

1 Reserve Notes (“FRN”). The production of FRN involves highly-trained and skilled
2 craftspeople, specialized equipment, and a combination of traditional, old-world printing
3 techniques merged with sophisticated, cutting-edge technology.

4 3. The BEP produces genuine FRN through a combination of printing
5 processes, which include offset, intaglio, and typographic printing.

6 a. Offset Printing: This involves the printing of background colors by
7 high-speed, offset presses. These presses print security offset image designs onto
8 currency paper.

9 b. Intaglio Printing: Some images are engraved onto the surface of a
10 plate. Ink is applied to a plate so that it remains only in the engraved areas. Paper
11 is then laid atop, and the two plates are pressed together under great pressure. As
12 a result, the ink from the recessed areas is pulled onto the paper, creating a raised,
13 finished image. Intaglio printing is used for the portraits, vignettes, scrollwork,
14 numerals, and lettering, which are unique to each denomination.

15 c. Typographic Printing: This final process utilizes the letterpress
16 printing process. This process adds two serial numbers, the black universal Federal
17 Reserve seal, the green Department of the Treasury seal, and the corresponding
18 Federal Reserve identification number to each FRN.

19 4. The paper and ink used in the production of FRN is unique as well.

20 5. Each FRN contains a year or series printed on the actual bill. This year
21 does not necessarily represent the year it was printed. The series designation changes
22 only when significant changes are made to the note design.

23 6. The serial number (“SN”) found on each FRN serves to uniquely identify
24 each note within its denomination and series.

25 7. The Face Plate (“FP”) number identifies the particular printing plate that
26 was used to print the face side of a note. The Back Plate (“BP”) number identifies the
27 plate used for the backside of the note.

1 using much of the same printing technology the government uses in the production of a
 2 genuine FRN. In addition, the Treasury Seal and serial numbers on the Southwest note
 3 appear to have been computer generated. In order to mimic a genuine bill, the note is
 4 composed of two sheets of paper glued together that contain an embedded counterfeit
 5 security thread. The Southwest note also contains blue and red fibers, which imitate
 6 genuine security fibers but do not share the same characteristics as real fibers.

7 16. For years, defendant KRAJEKIAN, working with others, obtained,
 8 possessed, passed, and transferred high-quality counterfeit U.S. currency (consistent with
 9 the Southwest note) and circulated said counterfeit U.S. currency at commercial
 10 establishments around the U.S. in exchange for legitimate U.S. currency and other items
 11 of value.

12 17. On or about May 1, 2009, KRAJEKIAN passed \$100 counterfeit bills
 13 (Southwest notes) at the following retail establishments at the Mesa Fiesta Mall, 1445 W.
 14 Southern Ave, Mesa, Arizona:

<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Champs	\$8.63 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G21984898C
Aeropostale	\$10 gift card	\$100 counterfeit bill (Southwest note)	1990	G21910978C
Foot Action	\$6.47 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G21986744C
Bath and Body Works	\$10 gift card	\$100 counterfeit bill (Southwest note)	1990	G21970114C
Foot Locker	\$8.63 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G21970112C
Hollister	\$10.70 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G22031096C

Dillards	\$7.55 in merchandise	\$100 counterfeit bill (Southwest note)	1990	G22021856C
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18. On or about August 11, 2013, KRAJEKIAN was driving eastbound through Oklahoma in a rental car. He was stopped by law enforcement, and in his rental car was \$54,000 in counterfeit currency, composed of \$100 bills. The counterfeit bills were determined to be Southwest notes. KRAJEKIAN also had in his possession several \$10 gift cards, which were purchased in New Mexico, Texas, and Oklahoma.

19. On or about April 29, 2014, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments in Las Vegas, Nevada:

<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Ralph Lauren, Las Vegas Blvd. South #222 (Las Vegas, NV)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1990	L35200482B
Victoria's Secret, 6605 Las Vegas Blvd. (Las Vegas, NV)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1990	L35470102B

20. On or about June 21, 2014, KRAJEKIAN passed a \$100 counterfeit bill (Southwest note) at the following retail establishment in Broomfield, Colorado:

<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Victoria's Secret, Flatiron Crossing Mall (Broomfield, CO)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78158672I

21. On or about on July 14, 2014, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments at the Fashion Square Mall, 7014 E. Camelback Rd., Scottsdale, Arizona ("Fashion Square Mall"):

<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Bath and Body Works	\$10 Gift Card	\$100 counterfeit bill (Southwest note)	1996	AB78103196L
Banana Republic	Clothing costing approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78103212L
Love Culture	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78122796L
Express	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78135852L
Hollister	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78109724L
Gap	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78046076L
Abercrombie Kids	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78044444L

22. On or about July 19, 2014, KRAJEKIAN passed a \$100 counterfeit bill (Southwest note) at the following retail establishment in California:

<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Victoria's Secret, Valencia Town Center (Valencia, California)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78050988L

23. On or about on August 25, 2014, KRAJEKIAN passed \$100 counterfeit bills (Southwest notes) at the following retail establishments at the Arizona Mills mall,

1 5000 S. Arizona Mills Cir., Tempe, Arizona (“Arizona Mills”):

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<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Nike Factory Store	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78072216L
Carters	\$10.81 fleece	\$100 counterfeit bill (Southwest note)	1996	AB78209300L
Old Navy	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78222360L
Disney Store	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548
Levis	\$9.83 shirt	\$100 counterfeit bill (Southwest note)	1996	AB78157076L
Oshkosh B Gosh	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78144020L
Victoria’s Secret	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78202772L

21 24. On or about September 6, 2014, KRAJEKIAN passed \$100 counterfeit bills
 22 (Southwest notes) at the following retail establishments at the Chandler Fashion Center,
 23 3111 W Chandler Blvd, Chandler, Arizona (“Chandler Fashion Center”):

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<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
Disney Store	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78240312L

1	The Children's Place	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78175032L
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3	Hollister	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78188088L
4					
5	Gap	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78181560L
6					
7	Barnes and Noble	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78168504L
8					
9					
10	Bath and Body Works	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78161976L
11					
12	Victoria's Secret	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L
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COUNT ONE
Conspiracy
(18 U.S.C. § 371)

16 25. The factual allegations in paragraphs 1-24 of the Indictment are
17 incorporated by reference and re-alleged as though fully set forth herein.

18 26. Beginning at a time unknown to the Grand Jury, but at least as early as on
19 or about 2003, to the present, in the District of Arizona and elsewhere, defendant
20 GARBIS ARAM KRAJEKIAN, along with others known and unknown to the Grand
21 Jury, did knowingly and willfully agree and conspire with each other to commit one or
22 more of the following offenses against the United States:

- 23 a. Title 18, United States Code, Section 471, Obligations or Securities of the
24 United States;
- 25 b. Title 18, United States Code, Section 472, Uttering Counterfeit Obligations
26 or Securities; and
- 27 c. Title 18, United States Code, Section 473, Dealing in Counterfeit
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Obligations or Securities.

OBJECTS OF THE CONSPIRACY

27. The objects of the conspiracy were:

- a. To produce and/or obtain high quality counterfeit \$100 bills;
- b. To circulate and distribute counterfeit currency into legitimate commercial businesses;
- c. To purchase inexpensive items or gift cards from merchants and pay for these nominal commercial items with counterfeit \$100; and
- d. To obtain and accumulate large amounts of genuine currency, and other things of value, in exchange for the counterfeit \$100 bills being circulated and passed at these commercial businesses.

MANNER AND MEANS OF THE CONSPIRACY AND SCHEME TO DEFRAUD

28. The manner and means of the conspiracy are described in paragraphs 1-27 above, incorporated by reference and re-alleged as though fully set forth herein.

OVERT ACTS

29. In furtherance of the conspiracy, and to achieve the objects of the conspiracy, defendant, and others known and unknown, committed or caused to be committed various overt acts in the District of Arizona and elsewhere. The following overt acts, among others, were committed:

<u>Overt Act</u>	<u>Date</u>	<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
a	7/14/14	Bath and Body Works, Fashion Square Mall (Scottsdale, AZ)	\$10 Gift Card	\$100 counterfeit bill (Southwest note)	1996	AB78103196L
b	7/14/14	Banana Republic, Fashion Square Mall (Scottsdale, AZ)	Clothing costing approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78103212L

1	c	7/14/14	Love Culture, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78122796L
2	d	7/14/14	Express, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78135852L
3	e	7/14/14	Hollister, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78109724L
4	f	7/14/14	Gap, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78046076L
5	g	7/14/14	Abercrombie Kids, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78044444L
6	h	8/25/14	Nike Factory Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78072216L
7	i	8/25/14	Carters, Arizona Mills (Tempe, AZ)	\$10.81 fleece	\$100 counterfeit bill (Southwest note)	1996	AB78209300L
8	j	8/25/14	Old Navy, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78222360L

1	k	8/25/14	Disney Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548
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4	l	8/25/14	Levis, Arizona Mills (Tempe, AZ)	\$9.83 t-shirt	\$100 counterfeit bill (Southwest note)	1996	AB78157076L
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6							
7	m	8/25/14	Oshkosh B Gosh, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78144020L
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11	n	8/25/14	Victoria's Secret, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78202772L
12							
13							
14	o	9/06/14	Disney Store, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78240312L
15							
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17							
18	p	9/06/14	The Children's Place, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78175032L
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21	q	9/06/14	Hollister, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78188088L
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23							
24	r	9/06/14	Gap, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78181560L
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1	s	9/06/14	Barnes and Noble, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78168504L
2	t	9/06/14	Bath and Body Works, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78161976L
3	u	9/06/14	Victoria's Secret, Chandler Fashion Center (Chandler, AZ)	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L

11 In violation of Title 18, United States Code, Section 371.

12 **COUNT TWO**
13 **Conspiracy to Launder Monetary Instruments**
14 **18 U.S.C. § 1956(h)**

15 30. The factual allegations in paragraphs 1-29 and 33 of the Indictment are incorporated by reference and re-alleged as though fully set forth herein.

16 31. Beginning at a time unknown to the Grand Jury, but at least as early as on
17 or about 2003, to the present, in the District of Arizona and elsewhere, defendant
18 GARBIS ARAM KRAJEKIAN, along with others, known and unknown to the Grand
19 Jury, did knowingly conspire, and agree to commit a money laundering offense against
20 the United States, in violation of Title 18, United States Code, Section 1956, to wit: to
21 knowingly conduct and attempt to conduct a financial transaction affecting interstate and
22 foreign commerce, which involved the proceeds of a specified unlawful activity, that is
23 violations of Title 18, United States Code, Section 471 (Obligations or Securities of the
24 United States); Title 18, United States Code, Section 472 (Uttering Counterfeit
25 Obligations or Securities); and Title 18, United States Code, Section 473 (Dealing in
26 Counterfeit Obligations or Securities), with the intent to promote the carrying on of said
27 specified unlawful activity, that is counterfeiting activities, and that while conducting and
28

1 attempting to conduct such financial transactions, defendant and others knew that the
2 property involved in the financial transactions represented the proceeds of some form of
3 unlawful activity as described herein.

4 In violation of Title 18, United States Code, Section 1956(h).

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6 **COUNTS THREE - TWENTY-THREE**
7 **Uttering Counterfeit Obligations or Securities**
8 **18 U.S.C. § 472**

9 32. The factual allegations in paragraphs 1-31 of the Indictment are
10 incorporated by reference and re-alleged as though fully set forth herein.

11 33. On or about the dates listed below, in the District of Arizona and elsewhere,
12 defendant GARBIS ARAM KRAJEKIAN, along with others both known and unknown
13 to the Grand Jury, with intent to defraud, did pass, utter, and attempt to pass and utter a
14 falsely made, forged, and counterfeited obligation of the United States, that is, a Federal
15 Reserve Note in the denomination of one hundred dollars, with a corresponding
16 identifier, which he and others then knew to be falsely made, forged and counterfeited, as
17 set forth in the chart below, each such instance being a separate count of this Indictment:

<u>Ct.</u>	<u>Date</u>	<u>Store</u>	<u>Item Purchased</u>	<u>FRN Used</u>	<u>Series</u>	<u>Serial Number</u>
3	7/14/14	Bath and Body Works, Fashion Square Mall (Scottsdale, AZ)	\$10 Gift Card	\$100 counterfeit bill (Southwest note)	1996	AB78103196L
4	7/14/14	Banana Republic, Fashion Square Mall (Scottsdale, AZ)	Clothing costing approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78103212L
5	7/14/14	Love Culture, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78122796L

1	6	7/14/14	Express, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78135852L
2	7	7/14/14	Hollister Fashion Square Mall, (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78109724L
3	8	7/14/14	Gap, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78046076L
4	9	7/14/14	Abercrombie Kids, Fashion Square Mall (Scottsdale, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78044444L
5	10	8/25/14	Nike Factory Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78072216L
6	11	8/25/14	Carters, Arizona Mills (Tempe, AZ)	\$10.81 fleece	\$100 counterfeit bill (Southwest note)	1996	AB78209300L
7	12	8/25/14	Old Navy, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996	AB78222360L
8	13	8/25/14	Disney Store, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78150548

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2	14	8/25/14	Levis, Arizona Mills (Tempe, AZ)	\$9.83 t-shirt	\$100 counterfeit bill (Southwest note)	1996 AB78157076L
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4	15	8/25/14	Oshkosh B Gosh, Arizona Mills (Tempe, AZ)	\$10 gift card or insubstantial purchase for approx. \$10	\$100 counterfeit bill (Southwest note)	1996 AB78144020L
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6	16	8/25/14	Victoria's Secret, Arizona Mills (Tempe, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78202772L
7						
8	17	9/06/14	Disney Store, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78240312L
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10	18	9/06/14	The Children's Place, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78175032L
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12	19	9/06/14	Hollister, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78188088L
13						
14	20	9/06/14	Gap, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78181560L
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16	21	9/06/14	Barnes and Noble, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996 AB78168504L
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22	9/06/14	Bath and Body Works, Chandler Fashion Center (Chandler, AZ)	\$10 gift card	\$100 counterfeit bill (Southwest note)	1996	AB78161976L
23	9/06/14	Victoria's Secret, Chandler Fashion Center (Chandler, AZ)	\$8.62 purchase	\$100 counterfeit bill (Southwest note)	1996	AB78129336L

In violation of Title 18, United States Code, Section 472.

FORFEITURE ALLEGATION

34. The factual allegations in paragraphs 1 through 33 of the Indictment are incorporated by reference and re-alleged as though set forth fully herein.

35. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(2)(B), and Title 28, United States Code, Section 2461, and as a result of committing one or more of the offenses in Counts 1 - 23 of this Indictment, defendant GARBIS ARAM KRAJEKIAN shall forfeit to the United States, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses, including but not limited to the aggregate sum of \$2.5 million, in that the aggregate sum is the proceeds of the specified unlawful acts, as defined in Title 18, United States Code, Sections 1956(c)(7)(A) and 1961(1), to wit: Title 18, United States Code, Section 472 (Uttering Counterfeit Obligations and Securities).

36. Pursuant to Title 18, United States Code, Section 982(a)(1), and as a result of committing the money laundering offense charged in Count 2 of this Indictment, in violation of Title 18, United States Code, Section 1956(h), defendant GARBIS ARAM KRAJEKIAN shall forfeit to the United States:

- a. All right, title and interest in any and all property, real and personal, involved in the violation of Title 18, United States Code, Section 1956(h), if convicted, and all property traceable to such property, including the following: 1) all money or other property that was the subject of each transaction, transportation,

1 transmission, or transfer in violation of Section 1956(h); 2) all commissions, fees,
2 and other property constituting proceeds obtained as a result of this violation; and
3 3) all property used in any manner to commit or facilitate the commission of this
4 offense.

5 b. A sum of money equal to the total amount of money involved in the
6 Section 1956(h) offense, if convicted.

7 37. Pursuant to Title 18, United States Code, Section 492, and as a result of
8 committing one or more of the offenses in Counts 1, 3 - 23 of this Indictment, defendant
9 GARBIS ARAM KRAJEKIAN shall forfeit to the United States all articles, devices, and
10 other things made, possessed or used or intended to be used in violation of Title 18,
11 United States Code, Section 472.

12 38. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by
13 Title 18, United States Code, Section 982(b), and Title 28, United States Code, Section
14 2461, defendant shall forfeit substitute property, up to the value of the amount described
15 above, if by any act or omission of defendant, the property described above, or any
16 portion thereof, cannot be located upon the exercise of due diligence; has been
17 transferred, sold to or deposited with a third party; has been placed beyond the
18 jurisdiction of the court; has been substantially diminished in value; or has been
19 commingled with other property which cannot be divided without difficulty.

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