FELONY

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR CONSPIRACY TO COMMIT MONEY LAUNDERING, MATERIAL OMISSION AND MISSTATEMENT OF FACT ON CURRENCY TRANSACTION REPORTS, FAILURE TO FILE CURRENCY TRANSACTION REPORTS, FAILURE TO FILE FOREIGN BANK ACCOUNT REPORTS, MAKING AND SUBSCRIBING FALSE TAX RETURN, AND AIDING AND ASSISTING IN THE PREPARATION OF A FALSE TAX RETURN

UNITED STATES OF AMERICA	*	CRIMINAL NO.
v.	*	SECTION:
SUSANTHA WIJETUNGE	*	VIOLATIONS: 18 U.S.C. § 1956(h)
a/k/a VJ		18 U.S.C. § 2
MANULA WIJETUNGE	*	31 U.S.C. § 5324(a)(1)
a/k/a Manu		31 U.S.C. § 5324(a)(2)
VJ DISCOUNT, INC.	*	31 U.S.C. § 5324(d)
VJ & MANU PROPERTIES, LLC		31 U.S.C. § 5314
VJ & MANU PROPERTIES, II, LLC	*	31 U.S.C. § 5322(b)
VJ & MANU PROPERTIES, III, LLC		26 U.S.C. § 7206(1)
	*	26 U.S.C. § 7206(2)

* * *

The Grand Jury charges that:

COUNT 1
(Conspiracy to Commit Money Laundering)

A. AT ALL TIMES MATERIAL HEREIN

Federal Agencies and Definitions

1. The Financial Crimes Enforcement Network ("FinCEN") was a branch of the United States Department of the Treasury responsible for safeguarding the financial system from

illicit use; combatting money laundering; and promoting national security through the collection, analysis, and dissemination of financial intelligence.

2. The Internal Revenue Service ("IRS") was an agency of the United States Department of the Treasury responsible for administering the tax laws of the United States and collecting taxes owed to the United States.

3. A "means of identification" was any name or number that could be used, alone or in conjunction with any other information, to identify a specific individual, including a name, Individual Taxpayer Identification Number, and date of birth.

The Bank Secrecy Act

4. The Bank Secrecy Act ("BSA"), codified at 31 U.S.C. §§ 5313-5326, was a set of laws and regulations enacted by Congress to address an increase in criminal money laundering through financial institutions.

5. One of the BSA's mechanisms to uncover criminal activity conducted through financial institutions was a requirement that money services businesses, check cashers, and other financial institutions file a Currency Transaction Report ("CTR") with FinCEN, for any transaction involving more than $10,000 in currency.

6. The BSA and related regulations defined a money services business ("MSB") as a person wherever located doing business in the United States in one or more of the following capacities: dealer in foreign exchange, check casher, seller of money orders, or money transmitter.

7. Under the BSA and related regulations, a check casher was a person that accepted checks in return for currency or a combination of currency and other monetary instruments, in an amount greater than $1,000 for any person on any day in one or more transactions.

8. The BSA and related regulations required financial institutions such as check cashers to treat multiple currency transactions as a single transaction and file a CTR if the financial institution had knowledge that the multiple transactions were by or on behalf of any person and resulted in either cash in or cash out totaling more than $10,000 during any one business day. The BSA and related regulations further required a financial institution to verify the identity of both the individual presenting the transaction and of any person or entity on whose behalf the transaction was to be performed.

9. In addition, the BSA and related regulations required MSBs to develop, implement, and maintain an Anti-Money Laundering ("AML") program reasonably designed to prevent the MSB from being used to facilitate money laundering. The program had to incorporate policies, procedures, and controls reasonably designed to assure compliance with the BSA and implementing regulations.

10. The BSA and related regulations further required United States persons who had a financial interest in or signature authority over foreign financial accounts to file a Report of Foreign Bank and Financial Accounts ("FBAR"), if the aggregate value of the foreign financial accounts exceeded $10,000 at any time during the calendar year.

Relevant Individuals and the Defendants' Financial Activities

11. Defendants **SUSANTHA WIJETUNGE, a/k/a VJ**, and **MANULA WIJETUNGE, a/k/a Manu**, were married and resided in Kenner, Louisiana, which is within the Eastern District of Louisiana.

12. E.M., E.R., O.S., A.S., E.A., J.G., V.A., and M.G. were foreign nationals who resided in one or more of the following parishes, which are within the Eastern District of Louisiana: Orleans Parish, Jefferson Parish, and St. Tammany Parish.

13. Defendants **SUSANTHA WIJETUNGE** and **MANULA WIJETUNGE**, owned defendant **VJ DISCOUNT, INC.**, which was a Louisiana corporation that operated a convenience store and check cashing business in Kenner, Louisiana. Defendant **VJ DISCOUNT, INC.** was licensed as an MSB by the State of Louisiana and FinCEN. Defendant **MANULA WIJETUNGE** served as President of **VJ DISCOUNT, INC.**, while defendant **SUSANTHA WIJETUNGE** served as Vice President.

14. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** charged fees for cashing checks for others.

15. Defendants **SUSANTHA WIJETUNGE** and **MANULA WIJETUNGE** owned defendants **VJ & MANU PROPERTIES, LLC, VJ & MANU PROPERTIES, II, LLC**, and **VJ & MANU PROPERTIES, III, LLC**, which were Louisiana limited liability corporations used for holding rental property.

16. Capital One, N.A.; Whitney National Bank; JP Morgan Chase Bank; Iberiabank; Regions Bank; and Gulf Coast Bank & Trust Co. were financial institutions with locations within the Eastern District of Louisiana, the deposits of which were insured by the Federal Deposit Insurance Corporation. Edward Jones & Co. LP was a financial institution with locations within the Eastern District of Louisiana that was a broker and dealer registered with the Securities and Exchange Commission.

17. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE, VJ DISCOUNT, INC., VJ & MANU PROPERTIES, LLC, VJ & MANU PROPERTIES, II, LLC**, and **VJ & MANU PROPERTIES, III, LLC**, maintained one or more bank or investment accounts at Capital One, N.A.; Whitney National Bank; JP Morgan Chase Bank; Iberiabank; Regions Bank; Gulf Coast Bank & Trust Co.; and Edward Jones & Co. LP.

18. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** maintained one or more foreign bank accounts.

The Defendants' BSA Reporting Requirements and History

19. Check cashers such as defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** were financial institutions within the meaning of the BSA. As a result, defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** were subject to the CTR reporting requirements of the BSA and regularly filed CTRs reporting transactions involving cash in or out of more than $10,000 in a single day to a single person.

20. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** were required to maintain, and beginning on or about June 5, 2008 did in fact maintain, an Anti-Money Laundering Program. Among other things, this AML Program stated that **VJ DISCOUNT, INC.** would collect identification information from check cashing customers; would not conduct money service transactions with customers who refused to provide identification information or intentionally provided misleading information; and would file certain reports with FinCEN, including, but not limited to, CTRs for transactions involving currency that exceed $10,000.

21. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** were aware that the IRS conducted periodic audits of MSBs' compliance with the Bank Secrecy Act and related regulations.

B. THE CONSPIRACY

22. Beginning at a time unknown to the Grand Jury, but no later than on or about January 1, 2010, and continuing through on or before the date of this indictment, in the Eastern

District of Louisiana, and elsewhere, the defendants, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE, VJ & MANU PROPERTIES, LLC, VJ & MANU PROPERTIES, II LLC,** and **VJ & MANU PROPERTIES, III, LLC**, together with others, both known and unknown to the Grand Jury, did knowingly, intentionally, and unlawfully combine, conspire, confederate, and agree:

a. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);

b. to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under Federal law, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented

the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii); and

c. to knowingly engage, and attempt to engage, in monetary transactions by, through, or to a financial institution, affecting interstate and foreign commerce, in criminally-derived property of a value greater than $10,000, such property having been derived from a specified unlawful activity, that is, mail and wire fraud, in violation of Title 18, United States Code, Sections 1341 and 1343, in violation of Title 18, United States Code, Section 1957.

C. MANNER AND MEANS

23. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

24. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.**, would and did cash fraudulently obtained tax refund checks provided to them by individuals, including, but not limited to, E.M., E.R., O.S., A.S., J.G., V.A., and M.G. These individuals had fraudulently obtained, through use of the mails and interstate wire communications, tax refund checks by filing false tax returns using false or stolen means of identification.

25. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.**, would and did cash multiple fraudulently obtained tax refund checks, in one or more payees' names, for a single individual. Often, said individual falsely endorsed the fraudulently obtained tax checks in the payees' names inside **VJ DISCOUNT, INC.**

26. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did charge an inflated check cashing fee in exchange for cashing fraudulently obtained tax refund checks.

27. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.**, would and did arrange their business and financial records so as to obscure their cashing of fraudulently obtained tax refund checks from IRS and FinCEN auditors.

28. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did conceal their cashing of fraudulently obtained tax refund checks by filing materially false CTRs. Among other things, the CTRs falsely reported the identities of the individuals involved in the transaction and the amount of cash out.

29. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did conceal their cashing of fraudulently obtained tax refund checks by failing to file CTRs, as required by law.

30. When cashing the fraudulently obtained income tax checks for others, defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did obtain photocopies of forms of identification in the payees' names.

31. After the fraudulently obtained income tax refund checks were exchanged for cash, defendants **SUSANTHA WIJETUNGE** and **MANULA WIJETUNGE** comingled the fraud proceeds into **VJ DISCOUNT, INC.'s** normal check cashing activity, which served to conceal and disguise the fraudulent nature of these funds. First, the defendants deposited fraudulently obtained tax refund checks into **VJ DISCOUNT, INC.'s** business bank accounts. On some occasions, the defendants deposited fraudulently obtained tax refund checks into different **VJ DISCOUNT, INC.** bank accounts or on different days, despite said checks having

been cashed at the same date and time. Then, the defendants withdrew these funds in cash or transferred these funds to other bank accounts under the defendants' control, including those held in different defendants' names.

32. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did make overseas wire transfers into foreign bank accounts under their control. At least one of the foreign bank accounts had a balance of greater than $10,000 at one point during 2011, 2012, and 2013. The defendants would and did willfully fail to file FBARs reporting these overseas accounts for 2011, 2012, and 2013, despite having filed one or more such reports for 2008 and 2010.

33. Defendants **SUSANTHA WIJETUNGE** and **MANULA WIJETUNGE** would and did store large amounts of cash in their personal residence and in a safe deposit box.

34. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did conduct transactions in criminally-derived property of a value greater than $10,000.

35. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did cause real and personal property to be purchased, using funds and bank accounts that had facilitated money laundering, and then titled in the names of their relatives, as well as **VJ & MANU PROPERTIES, LLC, VJ & MANU PROPERTIES, II LLC**, and **VJ & MANU PROPERTIES, III, LLC**.

36. Defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** would and did file false federal income tax returns with the IRS that failed to report their true income.

37. On or about the date listed below, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** caused fraudulently obtained tax refunds, in the payee names, approximate amounts, and check types listed below, to be cashed at **VJ DISCOUNT, INC.**:

Paragraph	Date Cashed	Payee	Approx. Amount	Type of Check
37-A	March 1, 2012	M.E.B.	$10,000	Cashier's check
37-B	March 1, 2012	M.E.B.	$522	Cashier's check
37-C	March 3, 2012	D.E.E.	$9,099	Cashier's check
37-D	March 3, 2012	G.A.P.	$4,801	Cashier's check
37-E	March 12, 2012	J.A.L.	$10,000	Cashier's check
37-F	March 12, 2012	J.A.L.	$2,569	Cashier's check
37-G	March 12, 2012	J.C.L.	$8,122	Cashier's check
37-H	March 12, 2012	D.A.M.	$5,557	Cashier's check
37-I	March 14, 2012	A.J.D.	$5,888	Cashier's check
37-J	March 14, 2012	A.E.B.	$5,697	Cashier's check
37-K	March 15, 2012	R.R.	$5,669	Cashier's check
37-L	March 15, 2012	D.E.G.	$7,640	Cashier's check
37-M	March 15, 2012	C.A.P.	$5,002	Cashier's check
37-N	May 14, 2012	L.C.	$8,887	U.S. Treasury check
37-O	May 14, 2012	L.C.	$7,795	U.S. Treasury check
37-P	May 16, 2012	M.J.F.	$7,459	Cashier's check
37-Q	May 16, 2012	S.M.R.	$6,906	Cashier's check
37-R	May 17, 2012	E.S.	$23,299	U.S. Treasury check
37-S	May 21, 2012	I.N.R.	$7,492	U.S. Treasury check
37-T	May 21, 2012	L.E.G.I.	$3,239	U.S. Treasury check
37-U	May 21, 2012	C.L.M.	$3,185	U.S. Treasury check
37-V	May 21, 2012	C.L.M.	$3,321	U.S. Treasury check
37-W	May 21, 2012	J.A.F.L.	$6,323	U.S. Treasury check
37-X	May 26, 2012	A.J.F.	$5,791	Cashier's check
37-Y	May 26, 2012	C.A.C.	$5,845	Cashier's check
37-Z	May 26, 2012	N.A.M.	$6,623	Cashier's check
37-AA	May 26, 2012	N.A.M.	$451	Cashier's check
37-BB	June 27, 2012	E.R.E.R.	$7,420	U.S. Treasury check
37-CC	June 27, 2012	E.R.E.R.	$7,498	U.S. Treasury check
37-DD	July 2, 2012	F.P.	$1,089	U.S. Treasury check
37-EE	July 2, 2012	U.P.	$7,460	U.S. Treasury check
37-FF	July 2, 2012	V.M.	$2,386	U.S. Treasury check
37-GG	August 23, 2012	F.L.A.	$4,470	U.S. Treasury check
37-HH	August 23, 2012	F.L.A.	$4,235	U.S. Treasury check
37-II	August 23, 2012	M.F.	$5,482	U.S. Treasury check
37-JJ	September 4, 2012	L.C.	$6,338	U.S. Treasury check

37-KK	September 4, 2012	S.M.	$14,518	U.S. Treasury check
37-LL	March 6, 2013	N.R.B.	$7,989	U.S. Treasury check
37-MM	March 6, 2013	R.A.	$8,388	U.S. Treasury check
37-NN	March 7, 2013	M.R.	$7,896	U.S. Treasury check
37-OO	March 7, 2013	J.A.P.	$7,243	U.S. Treasury check
37-PP	March 7, 2013	A.L.	$7,172	U.S. Treasury check
37-QQ	March 8, 2013	V.H.D.	$8,513	U.S. Treasury check
37-RR	March 8, 2013	S.M.R.	$7,587	U.S. Treasury check
37-SS	March 8, 2013	J.A.C.	$9,186	U.S. Treasury check
37-TT	March 8, 2013	J.L.R.	$8,531	U.S. Treasury check
37-UU	March 12, 2013	J.A.L.	$7,290	Cashier's check
37-VV	March 12, 2013	G.A.P.	$6,867	Cashier's check
37-WW	March 28, 2013	A.J.P.	$7,089	Cashier's check
37-XX	March 28, 2013	O.O.A.	$7,356	Cashier's check

38. On or about the date listed below, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** did cause and attempt to cause a domestic financial institution, that is, **VJ DISCOUNT, INC.** to file a CTR that contained a material omission and misstatement of fact concerning, among other things, the true identity of the individuals involved in the financial transaction and the amount of cash out:

Paragraph	Date of Filing	Claimed Financial Transaction	CTR No.
38-A	March 9, 2012	Checks payable to and supposedly cashed by M.E.B., resulting in cash out to M.E.B. of $10,417	31000004191879
38-B	May 25, 2012	Check payable to and supposedly cashed by E.S., resulting in cash out to E.S. of $23,503	31000008038713
38-C	September 7, 2012	Check payable to and supposedly cashed by S.M., resulting in cash out to S.M. of $14,373	31000013484937

39. On or about the date listed below, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** did cause and attempt to cause a domestic financial institution, that is, **VJ DISCOUNT, INC.**, to fail to file a CTR, as required by law, by failing to report the following transactions:

Paragraph	Approx. Date	Description of Transaction
39-A	March 3, 2012	Checks payable to D.E.E. and G.A.P., with a total face value

		of approximately $13,900, resulting in cash out of greater than $10,000
39-B	March 12, 2012	Checks payable to J.A.L., J.C.L., and D.A.M., with a total face value of approximately $26,248, resulting in cash out of greater than $10,000
39-C	March 15, 2012	Checks payable to C.A.P., R.R., and D.E.G., with a total face value of approximately $18,311, resulting in cash out of greater than $10,000
39-D	May 14, 2012	Checks payable to L.C., with a total face value of approximately $16,682, resulting in cash out of greater than $10,000
39-E	May 16, 2012	Checks payable to M.J.F. and S.M.R., with a total face value of approximately $14,365, resulting in cash out of greater than $10,000
39-F	May 21, 2012	Checks payable to E.S.S., I.N.R., L.E.G.I., C.L.M., and J.A.F.L., with a total face value of approximately $23,560, resulting in cash out of greater than $10,000
39-G	June 27, 2012	Checks payable to E.R.E.R. with a total face value of approximately $14,918, resulting in cash out of greater than $10,000
39-H	July 2, 2012	Checks payable to F.P., U.P., and V.M., with a total face value of approximately $10,939, resulting in cash out of greater than $10,000
39-I	August 23, 2012	Checks payable to F.L.A. and M.F., with a total face value of approximately $14,187, resulting in cash out of greater than $10,000
39-J	September 4, 2012	Checks payable to L.C. and S.M., with a total face value of approximately $20,856, resulting in cash out of greater than $10,000
39-K	March 6, 2013	Checks payable to N.B. and R.A., with a total face value of approximately $16,377, resulting in cash out greater than $10,000
39-L	March 7, 2013	Checks payable to M.R., J.P., and A.L., with a total face value of approximately $22,312, resulting in cash out of greater than $10,000
39-M	March 8, 2013	Checks payable to V.H.D., S.M.R., J.A.C., and J.L.R., with a total face value of approximately $33,817, resulting in cash out of greater than $10,000
39-N	March 12, 2013	Checks payable to J.A.L. and G.A.P., with a total face value of approximately $14,157, resulting in cash out of greater than $10,000
39-O	March 28, 2013	Checks payable to A.J.P. and O.O.A., with a total face value of approximately $14,445, resulting in cash out of greater than $10,000

40. On or about the date listed below, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.** conducted and caused to be conducted the following financial transactions:

Paragraph	Deposit Date	Description of Transaction
40-A	March 2, 2012	Checks payable to M.E.B., with a total face value of approximately $10,522, deposited into Whitney Bank Account #...7435
40-B	March 5, 2012	Checks payable to D.E.E. and G.A.P., with a total face value of approximately $13,900, deposited into Capital One, N.A. Account #...6753
40-C	March 13, 2012	Checks payable to J.A.L., J.C.L., and D.A.M., with a total face value of approximately $26,248, deposited into Whitney Bank Account #...7435
40-D	March 15, 2012	Checks payable to A.J.D. and A.E.B. with a total face value of approximately $11,585, deposited into Whitney Bank Account #...7435
40-E	March 16, 2012	Checks payable to C.A.P., R.R., and D.E.G., with a total face value of approximately $18,311, deposited into Whitney Bank Account #...7435
40-F	May 15, 2012	Check payable to L.C., with a face value of approximately $8,887, deposited into Whitney Bank Account #...7435
40-G	May 16, 2012	Check payable to L.C., with a face value of approximately $7,795, deposited into Whitney Bank Account #...7435
40-H	May 17, 2012	Checks payable to M.J.F. and S.M.R. with a total face value of approximately $14,365, deposited into Whitney Bank Account #...7435
40-I	May 18, 2012	Check payable to E.S. with a face value of approximately $23,299, deposited into Capital One, N.A. Account #...6753
40-J	May 22, 2012	Checks payable to E.S.S., I.N.R., L.E.G.I., C.L.M., and J.A.F.L., with a total face value of approximately $23,560, deposited into Whitney Bank Account #...7435
40-K	June 28, 2012	Checks payable to E.R.E.R. with a total face value of approximately $14,918, deposited into Whitney Bank Account #...7435
40-L	July 3, 2012	Checks payable to F.P., U.P., and V.M., with a total face value of approximately $10,939, deposited into Capital One, N.A. Account #...6753
40-M	August 24, 2012	Checks payable to F.L.A. and M.F., with a total face value of approximately $14,187 , deposited into Capital One, N.A. Account #...6753
40-N	September 5, 2012	Checks payable to L.C. and S.M., with a total face value of approximately $20,856, deposited into Whitney Bank Account #...7435

40-O	March 7, 2013	Checks payable to N.B. and R.A., with a total face value of approximately $16,377, deposited into Whitney Bank Account #...7435
40-P	March 8, 2013	Check payable to A.L., with a face value of approximately $7,172, deposited into Capital One, N.A. Account #...6753
40-Q	March 8, 2013	Checks payable to M.R. and J.P., with a total face value of approximately $15,139, deposited into Whitney Bank Account #...7435
40-R	March 11, 2013	Check payable to J.L.R., with a face value of approximately $8,531, deposited into Capital One, N.A. Account #...6753
40-S	March 11, 2013	Checks payable to V.H.D., S.M.R., and J.A.C., with an aggregate face value of approximately $25,286, deposited into Whitney Bank Account #...7435
40-T	March 13, 2013	Checks payable to J.A.L. and G.A.P., with a total face value of approximately $14,157, deposited into Capital One, N.A. Account #...6753
40-U	March 29, 2013	Check payable to O.O.A., with a face value of approximately $7,356, deposited into Whitney Bank Account #...7435
40-V	March 29, 2013	Check payable to A.J.P., with a face value of approximately $7,089, deposited into Capital One, N.A. Account #...6753

All in violation of Title 18, United States Code, Section 1956(h).

COUNTS 2-4
(Material Omission and Misstatement of Fact on Currency Transaction Reports)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about the dates set forth below, in the Eastern District of Louisiana and elsewhere, defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did cause and attempt to cause a domestic financial institution, that is, **VJ DISCOUNT, INC.**, to file a report required under Section 5313(a) of Title 31, and any regulation prescribed under any such

section, that contained a material omission and misstatement of fact concerning, among other things, the true identity of the individuals involved in the financial transaction and the amount of cash out, and did so while violating another law of the United States, that is, money laundering, and as part of a pattern of illegal activity involving more than $100,000 in a 12-month period:

Count	Related Paragraph	Approx. Date	Claimed Financial Transaction	CTR NO.
2	38-A	March 9, 2012	Checks payable to and cashed by M.E.B., resulting in cash out to M.E.B. of $10,417	31000004191879
3	38-B	May 25, 2012	Check payable to and cashed by E.S., resulting in cash out to E.S. of $23,503	31000008038713
4	38-C	September 7, 2012	Check payable to and cashed by S.M., resulting in cash out to S.M. of $14,373	31000013484937

All in violation of Title 31, United States Code, Sections 5324(a)(2) and 5324(d); Title 31, Code of Federal Regulations, Sections 1010.100, 1010.311, 1010.312 and 1010.313; and Title 18, United States Code, Section 2.

COUNTS 5-19
(Failure to File Currency Transaction Reports)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about each of the dates set forth below, in the Eastern District of Louisiana and elsewhere, defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE,** and **VJ DISCOUNT, INC.** knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did

cause and attempt to cause a domestic financial institution, that is, **VJ DISCOUNT, INC.**, to fail to file a report required under Section 5313(a) of Title 31, and any regulation prescribed under any such section, and did so while violating another law of the United States, that is, money laundering, and as part of a pattern of illegal activity involving more than $100,000 in a 12-month period:

Count	Related Paragraph	Approx. Date	Description of Transaction
5	39-A	March 3, 2012	Checks payable to D.E.E. and G.A.P., with a total face value of approximately $13,900, resulting in cash out of greater than $10,000
6	39-B	March 12, 2012	Checks payable to J.A.L., J.C.L., and D.A.M., with a total face value of approximately $26,248, resulting in cash out of greater than $10,000
7	39-C	March 15, 2012	Checks payable to C.A.P., R.R., and D.E.G., with a total face value of approximately $18,311, resulting in cash out of greater than $10,000
8	39-D	May 14, 2012	Checks payable to L.C., with a total face value of approximately $16,682, resulting in cash out of greater than $10,000
9	39-E	May 16, 2012	Checks payable to M.J.F. and S.M.R., with a total face value of approximately $14,365, resulting in cash out of greater than $10,000
10	39-F	May 21, 2012	Checks payable to E.S.S., I.N.R., L.E.G.I., C.L.M., W.A.A.R., and J.A.F.L., with a total face value of approximately $37,486, resulting in cash out of greater than $10,000
11	39-G	June 27, 2012	Checks payable to E.R.E.R., with a total face value of approximately $14,918, resulting in cash out of greater than $10,000
12	39-H	July 2, 2012	Checks payable to F.P., U.P., and V.M., with a total face value of approximately $10,939, resulting in cash out of greater than $10,000
13	39-I	August 23, 2012	Checks payable to F.L.A. and M.F., with a total face value of approximately $14,187, resulting in cash out of greater than $10,000
14	39-J	September 4, 2012	Checks payable to L.C. and S.M., with a total face value of approximately $20,856, resulting in cash out of greater than $10,000
15	39-K	March 6, 2013	Checks payable to N.B. and R.A., with a total face value of approximately $16,377, resulting

			in cash out greater than $10,000
16	39-L	March 7, 2013	Checks payable to M.R., J.P., and A.L., with a total face value of approximately $22,312, resulting in cash out of greater than $10,000.
17	39-M	March 8, 2013	Checks payable to V.H.D., S.M.R., J.A.C., and J.L.R., with a total face value of approximately $33,817, resulting in cash out of greater than $10,000
18	39-N	March 12, 2013	Checks payable to J.A.L. and G.A.P., with a total face value of approximately $14,157, resulting in cash out of greater than $10,000
19	39-O	March 28, 2013	Checks payable to A.J.P. and O.O.A., with a total face value of approximately $14,445, resulting in cash out of greater than $10,000.

All in violation of Title 31, United States Code, Sections 5324(a)(1) and 5324(d); Title 31, Code of Federal Regulations, Sections 1010.100, 1010.311 and 1010.313; and Title 18, United States Code, Section 2.

COUNTS 20-22
(Failure to File a Foreign Bank Account Report)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about each of the dates set forth below, in the Eastern District of Louisiana and elsewhere, defendants **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.**, did knowingly and willfully fail to file with the U.S. Department of the Treasury a Report of Foreign Bank and Financial Accounts, Form TD F 90-22.1, disclosing that they had a financial interest in, and signature and other authority over, financial accounts in a foreign country, including undeclared accounts in the Republic of Sri Lanka, which each had an aggregate value of more than $10,000 during the years set forth below:

Count	Related Paragraph	Year	Due Date for Report of Foreign Bank and Financial Accounts
20	41-A	2011	June 30, 2012
21	41-B	2012	June 30, 2013
22	41-C	2013	June 30, 2014

All in violation of Title 31, United States Code, Sections 5314 and 5322(a); Title 31, Code of Federal Regulations, Sections 1010.350 and 1010.306(c) & (d); and Title 18, United States Code, Section 2.

COUNT 23
(Making and Subscribing a False Tax Return)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about February 12, 2013, in the Eastern District of Louisiana and elsewhere, defendants **SUSANTHA WIJETUNGE**, and **MANULA WIJETUNGE**, who were husband and wife, did willfully make and subscribe a joint 2012 Individual Income Tax Return, Form 1040, which was verified by a written declaration that it was made under the penalties of perjury, and which they did not believe to be true and correct as to every material matter, in that, among other things, it reported that total income on Line 22 was $87,584, whereas, as they then and there knew and believed, the amount of total income was substantially greater.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT 24
(Making and Subscribing a False Tax Return)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about April 15, 2013, in the Eastern District of Louisiana and elsewhere, defendant **MANULA WIJETUNGE**, did willfully make and subscribe a 2012 Income Tax Return for an S Corporation, Form 1120S, for **VJ DISCOUNT, INC.**, which was verified by a written declaration that it was made under the penalties of perjury, and which she did not believe to be true and correct as to every material matter, in that, among other things, it reported that other income on Line 5 was $122,003, and that total income on Line 6 was $161,748, whereas, as she then and there well knew and believed, the amounts of other income and total income were substantially greater than the amounts reported.

All in violation of Title 26, United States Code, Section 7206(1).

COUNT 25
(Aiding and Assisting in the Presentation of a False Tax Return)

A. AT ALL TIMES MATERIAL HEREIN

1. The allegations contained in Sections A and C of Count 1 above are realleged and incorporated as if set forth fully herein.

B. THE OFFENSE

2. On or about April 15, 2013, in the Eastern District of Louisiana and elsewhere, defendant **SUSANTHA WIJETUNGE**, did willfully aid and assist in, and procure, counsel, and advise the preparation and presentation to the IRS of a 2012 Income Tax Return for an S

Corporation, Form 1120S, for **VJ DISCOUNT, INC.**, which he did not believe to be true and correct as to every material matter, in that, among other things, it reported that other income on Line 5 was $122,003, and that total income on Line 6 was $161,748, whereas, as he then and there well knew and believed, the amounts of other income and total income were substantially greater than the amounts reported.

All in violation of Title 26, United States Code, Section 7206(2).

NOTICE OF MONEY LAUNDERING FORFEITURE

1. The allegations of Count 1 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

2. As a result of the offense alleged in Count 1, defendants, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE, VJ DISCOUNT, INC., VJ & MANU PROPERTIES, LLC, VJ & MANU PROPERTIES, II, LLC,** and **VJ & MANU PROPERTIES, III, LLC,** shall forfeit to the United States all property real or personal, involved in the aforesaid offenses and all property traceable to such property which was involved in the said violation of Title 18, United States Code, Sections 1956(h) and 982, including but not limited to the following properties:

> $204,822.50 in U.S. Currency seized from VJ Discount, Inc.'s business location;
>
> $488,323 in U.S. Currency seized from Susantha Wijetunge and Manula Wijetunge's residence;
>
> Approximately $7,490 in U.S. Currency seized from Susantha Wijetunge and Manula Wijetunge's residence;
>
> $200 in U.S. Currency seized from Susantha Wijetunge and Manula Wijetunge's residence;

$300,000 in U.S. Currency seized from Gulf Coast Bank & Trust Safety Deposit Box No. 22;

2015 Audi Q5, bearing Vehicle Identification Number: WALDGAFP3FA038245;

$2,627,014.73 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100587617, in the name of VJ Discount, Inc.;

$600,635.26 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 50092455, in the name of VJ Discount, Inc.;

$64,408.11 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100585124, in the name of VJ Discount, Inc.;

$74,193.71 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100548825, in the name of VJ Discount, Inc.;

$31,875.02 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100585132, in the name of VJ Discount, Inc.;

$23,366.06 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100587427, in the name of VJ Discount, Inc.;

$35,558.55 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100596410, in the name of VJ Discount, Inc.;

$9,085.53 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100587435, in the name of VJ Discount, Inc.;

$26,944.35 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100540020, in the name of VJ Discount, Inc.;

$75,468.07 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100547637, in the name of VJ and Manu Properties, LLC;

$9,986.30 U.S. Currency, seized from Gulf Coast Bank and Trust, Account Number: 100587633, in the names of Susantha Wijetunge or Manula Wijetunge;

$17,356.94 U.S. Currency, seized from JP Morgan Chase Bank, Account Number: 448627807, in the name of VJ Discount, Inc.;

$72,700.12 U.S. Currency, seized from JP Morgan Chase Bank, Account Number: 617723239, in the name of VJ Discount, Inc.;

$8,098.75 U.S. Currency, seized from JP Morgan Chase Bank, Account Number: 984839019, in the name of VJ Discount, Inc.;

$132,017.99 U.S. Currency, seized from JP Morgan Chase Bank, Account Number: 839272630, in the names of Susantha Wijetunge or Manula Wijetunge;

$1,982.50 U.S. Currency, seized from JP Morgan Chase Bank, Account Number: 617769877, in the name of VJ Cafe and Grill, LLC;

$3,071.01 U.S. Currency, seized from Regions Bank, Account Number: 9002152106, in the names of Susantha Wijetunge or Manula Wijetunge;

$365,470.08 U.S. Currency, seized from Edward Jones Investment, Account Number: 222-07183, in the names of Susantha Wijetunge and Manula Wijetunge;

$33,057.35 U.S. Currency, seized from Edward Jones Investment, Account Number: 222-91626, in the name of Susantha Wijetunge;

$32,489.42 U.S. Currency, seized from Edward Jones Investment, Account Number: 222-91627, in the name of Manula Wijetunge;

Property currently recorded in the name of VJ's and Manu Properties II, LLC and described as follows: A certain piece or portion of ground, together with all the buildings and improvements thereon, and all the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, in that portion thereof known as Linwood Manor Subdivision, being a re-subdivision of Parcel "CC", dated August 14, 1963 and approved by Ordinance No. 6626 of the Jefferson Parish Council, dated September 12, 1963, and on a plan of resubdivision by the same surveyors, dated March 10, 1964, and approved by Ordinance No. 6653, of the Jefferson Parish Council, on June 4, 1964, and according to said plan are designated as Lot No. 2-A, Square 5, Linwood Manor Subdivision, commences at a distance of 39.65 feet from the corner of Wytchwood and Longwood Drives and measures thence 62 feet front Wytchwood Drive, the same width in the rear, by a depth of 108.73 feet between equal and parallel lines. Said square Five is bounded by Wytchwood, Longwood, and Madewood (side) Drives and the eastern boundary of the subdivision. The improvements thereon bear Municipal Number: 2505-07 Wytchwood Drive, Metairie, Louisiana;

Property currently recorded in the name of VJ's and Manu Properties, LLC and described as follows: A certain lot of ground, together with all

the improvements thereon, situated in the Parish of Jefferson, County of Kenner, State of Louisiana, in that part thereof known as Lincoln Manor, (formerly known as Kenner Project) and according to plan of resubdivision of Lots 48 & 49, Square 145, Kenner Project, Section 7, by R.L. Schumann, R.L.S., dated January 25, 1984, approved by the Planning & Zoning Commission, Ordinance No. 3884, March 15, 1984, registered in COB 1070, folio 864, Entry No. 8413634, said lot is not designated as Lot 49-A, Square 145, Lincoln Manor Subdivision, which said square is bounded by Marietta Street, 31st Street (formerly Charenton Avenue, Lexington Street and 30th Street (formerly Ashland Avenue); said Lot 49A measures 40 feet front on Marietta Street, same width in the rear by a depth of 120 feet between equal and parallel lines. The improvements thereon bear Municipal Number: 3020 Marietta Street, Kenner, Louisiana;

Property currently recorded in the name of VJ's and Manu Properties, III, LLC and described as follows: A certain piece or portion of ground, together with all the buildings and improvements thereon, and all of the rights, ways privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the State of Louisiana, Parish of Jefferson, City of Kenner, Briarwood Subdivision, in Square No. 179, bounded by Connecticut Avenue, 35th (West Esplanade) Street, Delaware Avenue and 34th (16th) Street, designated as Lot No. 9-A, measuring as follows, to-wit: Lot No. 9-A commences 186 feet the corner of Connecticut Avenue and 35th Street and measures thence 59 feet front on Connecticut Avenue, same width in the rear, by a depth of 127.5 feet between equal and parallel lines, all in accordance with a survey by Curry Dixon & Sons, Inc., dated May 4, 1972, a copy of which is annexed to Act No. 561902. The improvements thereon bear Municipal Number: 3424-26 Connecticut Avenue, Kenner, Louisiana;

Property currently recorded in the name of VJ's and Manu Properties II, LLC and described as follows: One certain lot or portion of ground, together with all the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, in Independence Park Subdivision, being a resubdivision of a portion of the original Cleary Subdivision, according to a plan of Independence Park Subdivision by J.J. Krebs and Sons, C.E., dated 3-4-58, approved by the Jefferson Parish Council by Ordinance No. 3758 and Ordinance No. 3757, registered in COB 450, folio 429 and COB 450, folio 430, respectively, said Lot is designated as Lot 7 and is shown on said plan of Independence Park Subdivision by J.J. Krebs & Sons, C.E., dated 3-4-58 to measure as follows, Lot 7 in that square bounded by Bunker Hill Drive, Jefferson Drive, Lexington Drive, Division Street (late Lake Avenue) and the northern boundary of subdivision, measures 60 feet front on Bunker Hill Drive, same width in the rear, and 106.07 feet in

depth between equal and parallel lines. Lot 7 commences 343.26 feet from a point of curvature at the intersection of Division Street and Bunker Hill Drive. All in accordance with a plan of survey by J.J. Krebs & Sons, Inc., dated 1-8-78, annexed to act at COB 918-465. The improvements thereon bear Municipal Number: 3725-27 Bunker Hill Drive, Metairie, Louisiana;

Property currently recorded in the name of VJ's and Manu Properties, III, LLC and described as follows: Two certain lots of ground, together with all the buildings and improvements thereon, and all the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, in Highway Park, City of Kenner, in square 377, bounded by Idaho and Illinois Avenue, 25th Street and 26th Street, designated as Lot Nos. 5 and 6, on a survey of Gilbert, Kelly & Couturie, Inc., Surveying and Engineering, dated June 29, 1972, a copy of which is annexed to act of M.I. Fisher, Notary Public, dated July 20, 1972, and according to said survey, said lots measure as follows, to-wit: Lot Nos. 5 and 6 adjoin each other and measure each 25 feet front on Idaho Avenue, same in the rear, fronting on a 15 foot alley, by a depth of 120 feet between equal and parallel lines. Said Lot No. 5 commences at a distance of 100 feet from the corner of Idaho Avenue and 26th Street. As per the Revocation of Alleyway recorded at COB 737 folio 551 said lots has a depth of 127.5 feet between equal and parallel lines. The improvements thereon bear Municipal Number: 2536 Idaho Avenue, Kenner, Louisiana;

Property currently recorded in the name of VJ's and Manu Properties, LLC and described as follows: That portion of ground, together with all the buildings and improvements thereon and all of the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the City of Kenner, Parish of Jefferson, State of Louisiana, designated as Lot A-1-A3, being a portion of Original Lot A-1-A in Westgate Subdivision, bounded by Roosevelt Boulevard, Veterans Memorial Highway, 26th Street and Massachusetts Avenue (side), all in accordance with a plan of resubdivision by R.P. Fontcuberta, Jr., Reg. Professional Land Surveyor, dated January 8, 1991, and is more fully described as follows: Commencing at the intersection of the southerly right of way line of Veterans Memorial Highway and the easterly right of way line of Veterans Memorial Highway and the easterly right of way line of Roosevelt Boulevard, said intersection is the northwest corner of Lot A-1-A1 and has an interior angle of 89 degrees 55 minutes 58 seconds and is marked by a ½" iron rod: thence, along the aforesaid right of way line in a southerly direction, go a distance of 210.00 feet to a point; said point is the Point of Beginning. Thence, turn an interior angle of 90 degrees 00 minutes in an easterly direction, go a distance of 50.00 feet to a point; thence, turn an interior angle of 90 degrees 00 minutes in a southerly direction, go a distance of 171.95 feet to a point; thence, turn an

interior angle of 90 degrees 00 minutes in a westerly direction, go a distance of 50.00 feet to a point on the easterly right of way line of Roosevelt Boulevard; thence, turn an interior angle of 90 degrees 00 minutes in a northerly direction, along the aforesaid right of way line, go a distance of 171.95 feet to the Point of Beginning. All as per survey of Dufrene Surveying & Engineering, Inc. dated August 24, 2005, annexed hereto. A 1,476 square foot portion of the Roosevelt Boulevard Right-of-Way located along the west side of Lot A-1-A3, Square A1, Westgate Subdivision, Kenner, Jefferson Parish, Louisiana. A survey conducted on July 24, 2012, made at the request of VJ and Manu Properties, LLC, resubdivision of Lot A-1-A3 and portion of Roosevelt Boulevard into Lot A-1-A3A. Improvements thereon bear Municipal Number: 2714 Roosevelt Blvd., A & B, Kenner, Louisiana;

Property currently recorded in the name of Nadeeshani S. Wijetunge and described as follows: That certain piece or portion of ground, together with all the buildings and improvements thereon, and all the rights, ways, privileges, servitudes, appurtenances and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, in that part thereof known as Highway Park Subdivision, according to a plan of resurvey made by Adloe Orr, Jr & Associates, Consulting Engineers, dated July 9, 1957, revised September 13, 1957, a copy of which is on file in the office of the Clerk of Court, Parish of Jefferson, State of Louisiana, in Plot Book 34, folio 8, which said portion of ground is Lot Q of Square 361 and said portion of ground has the same designated on a certificate of survey by Adloe Orr, Jr. & Associates, dated April 17, 1958. The improvements thereon bear the Municipal Number: 2611 Kansas Avenue, Kenner, Louisiana;

Property currently recorded in the names of Dharmadasa Kumarsinghe and Himasa Jayanath Wijetunge and described as follows: Land situate, lying and being in Jefferson Parish, Louisiana to wit: One certain piece or portion of ground, together with all the buildings and improvements thereon, and all of the rights, ways, privileges, servitudes, prescriptions and advantages thereunto belonging or in anywise appertaining, situated in the Parish of Jefferson, State of Louisiana, City of Kenner, in Highway Park Subdivision, according to a survey of Adloe Orr, Jr. & Associated, dated July 9, 1957, revised September 13, 1957, a copy of which is on file in the office of the Clerk of Court, Parish of Jefferson, State of Louisiana, in Plat Book 34, folio 8, which said portion of ground is designated as follows: Lot "B" of Square No. 331-332, which is bounded by 27th Street, Indiana Avenue, Veterans Memorial Boulevard and Kansas Avenue, said lot commences at a distance of 65 feet from the corner of 27th Street and Indiana Avenue, and measures thence 60 feet front on 27th Street, same in width in the rear, by a depth between equal and parallel lines of 100 feet. All in accordance with a survey by Curry Dixon & Sons, Inc. dated

September 19, 1972 a copy of which is annexed to an act at Act No. 575683. The improvements thereon bear Municipal Address: 2302 27th Street, Kenner, Louisiana.

3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

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 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.

NOTICE OF STRUCTURING FORFEITURE

1. The allegations of Counts 2 through 19 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 31, United States Code, Sections 5324 and 5317(c)(1).

2. As a result of the offenses alleged in Counts 2 through 19, defendants, **SUSANTHA WIJETUNGE, MANULA WIJETUNGE**, and **VJ DISCOUNT, INC.**, shall forfeit to the United States all property, real or personal, involved in the offenses, and any property traceable thereto.

3. If any of the property subject to forfeiture, as a result of any act or omission of the defendants:

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), as incorporated by Title 31, United States Code, Section 5317(c)(1)(B), to seek forfeiture of any other property of said defendants up to the value of the above forfeitable property.

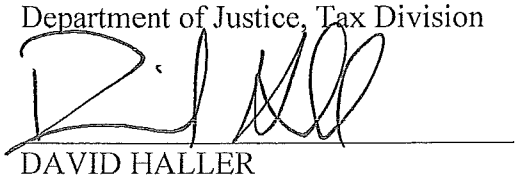
All in violation of Title 31, United States Code, Sections 5324 and 5317(c)(1).

A TRUE BILL:

_____
FOREPERSON

KENNETH ALLEN POLITE, JR.
UNITED STATES ATTORNEY

HAYDEN M. BROCKETT
MICHAEL HATZIMICHALIS
Trial Attorneys
Department of Justice, Tax Division



DAVID HALLER
Assistant United States Attorney

New Orleans, Louisiana
June 4, 2015