

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

UNITED STATES OF AMERICA)	No.
)	
v.)	Violations: Title 18, United
)	States Code, Sections
)	371, 1957 and 2; and Title
RAKESH ANAND and)	21, United States Code, Sections
MEENA ANAND)	841(a) and 846; Title 26, United
)	States Code, Section 7201; and
)	Title 31, United States Code,
)	Section 5324

INDICTMENT

COUNT ONE

The SPECIAL MAY 2010 GRAND JURY charges:

1. At times material to the Indictment:
 - a. Defendant RAKESH ANAND owned and operated Doctors Weight Loss Centers (“DWLCs”) in Merrillville, Indiana and Lansing and Orland Park, Illinois.
 - b. Defendant MEENA ANAND, the wife of RAKESH ANAND, assisted RAKESH ANAND in the operation of the DWLCs and managed the DWLCs in Lansing and Orland Park, Illinois.
 - c. Individual A, a physician, worked part-time dispensing controlled substances at the DWLCs.
 - d. Indiana Code Section 35-48-3-11 provided in pertinent part that a physician may not prescribe or dispense a Schedule III or Schedule IV controlled substance for a patient for purposes of weight reduction or to control obesity, unless the physician did the following:

(1) Determined: (A) through review of: (i) the physician's records of prior treatment of the patient; or (ii) the records of prior treatment of the patient provided by a previous treating physician or weight loss program; that the physician's patient had made a reasonable effort to lose weight in a treatment program using a regimen of weight reduction based on caloric restriction, nutritional counseling, behavior modification, and exercise without using controlled substances; and (B) that the treatment described above had been ineffective for the physician's patient.

(2) Obtained a thorough history and performs a thorough physical examination of the physician's patient before initiating a treatment plan using a Schedule III or Schedule IV controlled substance for purposes of weight reduction or to control obesity.

e. Title 21 C.F.R. 1306.04(a) provided that in order for a prescription for a controlled substance to be effective it had to be issued for a legitimate medical purpose by an individual practitioner acting in the usual course of his professional practice. The responsibility for the proper prescribing and dispensing of controlled substances was upon the prescribing practitioner.

2. Beginning no later than January 2002 and continuing until on or about February 24, 2010, in the Northern District of Indiana, Hammond Division, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, did conspire with each other, and with Individual A and with others known and unknown to the Grand Jury, to knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phendimetrazine, a Schedule III Controlled Substance, and a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice, in violation of Title 21, United States Code, Section 841(a)(1).

3. It was part of the conspiracy that RAKESH ANAND dispensed controlled substances without reviewing patients' records of prior treatment.

4. It was further part of the conspiracy that RAKESH ANAND dispensed controlled substances to patients without obtaining a thorough medical history of patients.

5. It was further part of the conspiracy that RAKESH ANAND dispensed controlled substances to patients without giving the patients a physical examination or performing any medical tests.

6. It was further part of the conspiracy that RAKESH ANAND hired Individual A, a physician, and other staff to dispense controlled substances to patients without giving the patients a physical examination or performing any medical tests.

7. It was further part of the conspiracy that RAKESH ANAND and MEENA ANAND allowed staff to dispense controlled substances to patients outside RAKESH

ANAND's presence and without his supervision.

8. It was further part of the conspiracy that RAKESH and MEENA ANAND offered discounts to patients who purchased two or three month's supply of Phendimetrazine and Phentermine with cash or a credit card.

9. It was further part of the conspiracy that RAKESH ANAND failed to monitor patients to whom he dispensed controlled substances.

10. It was further part of the conspiracy that MEENA ANAND transported controlled substances to and from the ANAND's residence into DWLCs.

11. It was further part of the conspiracy that RAKESH ANAND and MEENA ANAND, misrepresented, concealed and hid, and caused to be misrepresented, concealed and hidden, the purposes and acts done in furtherance of the conspiracy;

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWO

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about August 16, 2006, at Merrillville, in the Northern District of Indiana,
Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely,
a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled
Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United
States Code, Section 2.

COUNT THREE

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about September 6, 2006, at Merrillville, in the Northern District of Indiana,

Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT FOUR

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about October 25, 2006, at Merrillville, in the Northern District of Indiana,

Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FIVE

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about November 8, 2006, at Merrillville, in the Northern District of Indiana,
Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

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COUNT SIX

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about January 24, 2007, at Merrillville, in the Northern District of Indiana,
Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phendimetrazine, a Schedule III Controlled Substance, and a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT SEVEN

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about March 7, 2007, at Merrillville, in the Northern District of Indiana,
Hammond Division,

RAKESH ANAND,

defendant herein, did knowingly and intentionally distribute a controlled substance, namely, a quantity of mixtures and substances containing Phentermine, a Schedule IV Controlled Substance, outside of the usual course of professional practice;

In violation of Title 21, United States Code, Section 841(a)(1).

COUNTS EIGHT THROUGH TWENTY-SEVEN

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about the dates set forth below in the Northern District of Indiana, Hammond Division, and elsewhere, including the Northern District of Illinois,

RAKESH ANAND and

MEENA ANAND,

defendants herein, did willfully and for the purpose of evading the reporting requirements of Title 31, United States Code, Section 5313(a) and regulations prescribed thereunder, structure and assist in structuring transactions at a domestic financial institution, namely Bank Financial, by depositing and causing the deposit of United States currency in amounts under \$10,000, in separate transactions on one or more days at Bank Financial branches as set forth below, each transaction conducted on one or more days constituting a separate offense, and doing so as part of a pattern of illegal activity involving more than \$100,000 in a 12-month period.

Count	On or About the Following Dates	Amount	Branch	Total Amount of Structured Deposits
Eight	September 28, 2006 September 28, 2006	\$7,000 \$3,100	Orland Park, IL Orland Park, IL	\$10,100
Nine	November 14, 2006 November 14, 2006	\$5,840 \$4,800	Orland Park, IL Orland Park, IL	\$10,640
Ten	December 5, 2006 December 5, 2006	\$5,050 \$6,500	Orland Park, IL Orland Park, IL	\$11,550
Count	Date	Amount	Branch	Total Amount of Structured Deposits
Eleven	January 8, 2007 January 9, 2007	\$5,000 \$8,000	Naperville, IL Naperville, IL	\$13,000
Twelve	May 24, 2007 May 24, 2007	\$7,000 \$4,480	Orland Park, IL Orland Park, IL	\$11,480

Thirteen	April 9, 2008 April 11, 2008	\$8,400 \$8,500	Orland Park, IL Orland Park, IL	\$16,900
Fourteen	July 2, 2008 July 3, 2008	\$8,000 \$7,950	Naperville, IL Naperville, IL	\$15,950
Fifteen	November 6, 2008 November 7, 2008	\$8,400 \$5,350	Naperville, IL Naperville, IL	\$13,750
Sixteen	November 12, 2008 November 13, 2008	\$8,000 \$4,900	Naperville, IL Naperville, IL	\$12,900
Seventeen	November 19, 2008 November 20, 2008	\$8,000 \$5,600	Naperville, IL Naperville, IL	\$13,600
Eighteen	January 5, 2009 January 6, 2009	\$9,000 \$5,920	Naperville, IL Naperville, IL	\$14,920
Nineteen	February 10, 2009 February 11, 2009	\$9,000 \$7,640	Naperville, IL Naperville, IL	\$16,640
Twenty	March 2, 2009 March 3, 2009	\$9,000 \$6,850	Naperville, IL Naperville, IL	\$17,850
Count	Date	Amount	Branch	Total Amount of Structured Deposits
Twenty-One	March 10, 2009 March 11, 2009	\$8,000 \$8,000	Naperville, IL Naperville, IL	\$16,000
Twenty-Two	March 17, 2009 March 18, 2009	\$9,280 \$8,000	Naperville, IL Naperville, IL	\$17,280
Twenty-	March 30, 2009	\$9,000	Naperville, IL	\$17,100

Three	March 31, 2009	\$8,100	Naperville, IL	
Twenty-Four	April 28, 2009 April 30, 2009	\$7,000 \$6,000	Naperville, IL Naperville, IL	\$13,000
Twenty-Five	June 1, 2009 June 3, 2009	\$6,000 \$6,000	Naperville, IL Naperville, IL	\$12,000
Twenty-Six	June 9, 2009 June 11, 2009	\$7,000 \$7,000	Naperville, IL Naperville, IL	\$14,000
Twenty-Seven	October 9, 2009 October 10, 2009	\$9,100 \$9,050	Orland Park, IL Orland Park, IL	\$18,150

In violation of Title 31, United States Code, Section 5324(a) and Title 18,
United States Code, Section 2.

COUNT TWENTY-EIGHT

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about August 29, 2006, in the Northern District of Indiana, Hammond Division,
and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, knowingly engaged in and attempted to engage in a monetary transaction

affecting interstate commerce in criminally derived property of a value greater than \$10,000, which was derived from specified unlawful activity, namely the distribution of a controlled substance, as more fully described in Counts One through Seven of this Indictment, in that defendants knowingly transferred, and caused to be transferred, \$200,000 from a Bank Financial checking account to George Washington Savings for the purchase of two certificates of deposit;

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT TWENTY-NINE

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about February 23, 2007 in the Northern District of Indiana, Hammond Division, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, knowingly engaged in and attempted to engage in a monetary transaction

affecting interstate commerce in criminally derived property of a value greater than \$10,000, which was derived from specified unlawful activity, namely the distribution of controlled substances, as more fully described in Counts One through Seven of this Indictment, in that defendants knowingly transferred, and caused to be transferred, \$250,000 from a Bank Financial checking account to J.P. Morgan Chase Bank for the purchase of a certificate of deposit;

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT THIRTY

The SPECIAL MAY 2010 GRAND JURY further charges:

On or about February 8, 2008, in the Northern District of Indiana, Hammond Division, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, knowingly engaged in and attempted to engage in a monetary transaction affecting interstate commerce in criminally derived property of a value greater than \$10,000, which was derived from specified unlawful activity, namely the distribution of controlled substances, as more fully described in Counts One through Seven of this Indictment, in that defendants knowingly transferred, and caused to be transferred, \$150,000 from a Bank Financial checking account to a Charles Schwab Trust Account;

In violation of Title 18, United States Code, Sections 1957(a) and 2.

COUNT THIRTY-ONE

THE SPECIAL MAY 2010 GRAND JURY further charges:

1. At times material to the Indictment:
 - a. Defendants RAKESH ANAND and MEENA ANAND were residents of Tinley Park, Illinois.
 - b. RAKESH ANAND owned and operated Doctors Weight Loss Clinics

(“DWLCs”) as a sole proprietorship, with locations in Merrillville, Indiana, and Lansing and Orland Park, Illinois. MEENA ANAND assisted RAKESH ANAND in the operation of the DWLCs.

c. From 2005 through 2008, RAKESH ANAND and MEENA ANAND earned and received substantial gross income from the operation of the DWLCs.

e. By virtue of this gross income, RAKESH ANAND and MEENA ANAND were by law required to accurately report their gross receipts from the DWLCs each year on a Schedule C (Profit or Loss from Business) with their Federal income tax return, Form 1040.

f. RAKESH ANAND and MEENA ANAND maintained joint checking accounts at Bank Financial at locations in Illinois (hereinafter the “ANAND joint checking accounts”).

g. Tax Return Preparer A assisted in the preparation of tax returns for RAKESH ANAND and MEENA ANAND.

2. Beginning no later than January 1, 2005 and continuing through February 24, 2010 in the Northern District of Indiana, Hammond Division, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, did knowingly conspire with each other to defraud an agency of the United States, namely the Internal Revenue Service (“IRS”) by impeding, impairing, obstructing and

defeating the lawful functions of the IRS in the correct determination, assessment and collection of income taxes.

3. It was part of the conspiracy that RAKESH ANAND and MEENA ANAND agreed to conceal from the IRS income from the operation of the DWLCs in Indiana and Illinois for the tax years 2005 through 2008.

4. It was further part of the conspiracy that RAKESH ANAND and MEENA ANAND knowingly filed false individual income tax returns that did not correctly identify income that RAKESH ANAND and MEENA ANAND received in those years from the DWLCs.

OVERT ACTS

5. In order to effect the unlawful objectives of the conspiracy, RAKESH ANAND and MEENA ANAND committed and caused to be committed the following overt acts, among other acts, in the Northern District of Indiana and elsewhere:

a. Between September 2006 and December 2010, RAKESH ANAND and MEENA ANAND made numerous cash deposits in amounts under \$10,000 totaling over \$1,000,000 into a ANAND joint checking account to avoid the filing of currency transaction reports;

b. RAKESH ANAND and MEENA ANAND failed to deposit over \$700,000 in cash receipts from the DWLCs into the ANAND joint checking accounts;

c. RAKESH ANAND and MEENA ANAND failed to give Tax Return Preparer A bank statements showing the deposit of DWLCs business receipts into the

ANAND joint checking accounts;

d. For the tax years 2005, 2006, 2007 and 2008, RAKESH ANAND gave Tax Return Preparer A false, hand-written bookkeeping documents that significantly understated the gross receipts from the DWLCs;

e. On or about October 15, 2006, RAKESH ANAND and MEENA ANAND filed a false income tax return for the year 2005, in which they substantially under reported DWLCs gross receipts and the amount of income tax due and owing for the year 2005;

f. On or about October 15, 2007, RAKESH ANAND and MEENA ANAND filed a false income tax return for the year 2006, in which they substantially under reported DWLCs gross receipts and the amount of income tax due and owing for the year 2006;

g. On or about October 15, 2008, RAKESH ANAND and MEENA ANAND filed a false income tax return for the year 2007, in which they substantially under reported DWLCs gross receipts and the amount of income tax due and owing for the year 2007; and

h. On or about October 15, 2009, RAKESH ANAND and MEENA ANAND filed a false income tax return for the year 2008, in which they substantially under reported DWLCs gross receipts and the amount of income tax due and owing for the year

2008;

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

COUNT THIRTY-TWO

The SPECIAL MAY 2010 GRAND JURY further charges:

1. The GRAND JURY realleges and incorporates by reference paragraph 1 of Count THIRTY-ONE of this Indictment.

2. During the calendar year 2005, DWLCs had gross receipts of, at least, approximately \$612,130 and RAKESH ANAND and MEENA ANAND had taxable income of, at least, approximately \$332,499.

3. Upon this taxable income, RAKESH ANAND and MEENA ANAND owed to the United States of America income tax of, at least, approximately \$110,356.

4. By reason of this income, RAKESH ANAND and MEENA ANAND were required by law, following the close of the calendar year 2005, and on or before October 15, 2006 per an extension to make an income tax return to the Internal Revenue Service and to pay the income tax due and owing thereon.

5. Throughout calendar year 2005 and continuing to on or about October 5, 2006, in the Northern District of Indiana, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, well knowing all of the foregoing facts, did willfully attempt to evade and defeat the income tax due and owing by them to the United States of America for the 2005 calendar year by committing the following affirmative acts of evasion:

- a. giving their income tax return preparer false hand-written documents that substantially understated their gross income;
- b. filing a joint Federal income tax return, Form 1040, which falsely stated on Schedule C (Profit or Loss from Business), line 1, that their business had gross receipts and sales of \$426,934, when in fact as defendants well knew that the gross receipts and sales from the DWLCs were substantially more than \$426,934; and
- c. failing to pay approximately \$68,129 to the Internal Revenue Service,

the additional tax due and owing on their true taxable income;

In violation of Title 26, United States Code, Section 7201.

COUNT THIRTY-THREE

The SPECIAL MAY 2010 GRAND JURY further charges:

1. The GRAND JURY realleges and incorporates by reference paragraph 1 of Count THIRTY-ONE of this Indictment.

2. During the calendar year 2006, DWLCs had gross receipts of, at least, approximately \$943,113 and RAKESH ANAND and MEENA ANAND had taxable income of, at least, approximately \$607,329.

3. Upon this taxable income, RAKESH ANAND and MEENA ANAND owed to the United States of America income tax of, at least, approximately \$213,092.

4. By reason of this income, RAKESH ANAND and MEENA ANAND were required by law, following the close of the calendar year 2006, and on or before October 15, 2007 per an extension to make an income tax return to the Internal Revenue Service and to pay the income tax due and owing thereon.

5. Throughout calendar year 2006 and continuing to on or about October 3, 2007, in the Northern District of Indiana, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, well knowing all of the foregoing facts, did willfully attempt to evade and defeat the income tax due and owing by them to the United States of America for the 2006 calendar year by committing the following affirmative acts of evasion:

- a. giving their income tax return preparer false hand-written documents that substantially understated their gross income;
- b. filing a joint Federal income tax return, Form 1040, which falsely stated on Schedule C (Profit or Loss from Business), line 1, that their business had gross receipts and sales of \$488,223, when in fact as defendants well knew that the gross receipts and sales from the DWLCs were substantially more than \$488,223; and
- c. failing to pay approximately \$168,401 to the Internal Revenue Service, the additional tax due and owing on their true taxable income;

In violation of Title 26, United States Code, Section 7201.

COUNT THIRTY-FOUR

The SPECIAL MAY 2010 GRAND JURY further charges:

1. The GRAND JURY realleges and incorporates by reference paragraph 1 of Count THIRTY-ONE of this Indictment.

2. During the calendar year 2007, DWLCs had gross receipts of, at least, approximately \$1,222,364, and RAKESH ANAND and MEENA ANAND had taxable income of, at least, approximately \$887,739.

3. Upon this taxable income, RAKESH ANAND and MEENA ANAND owed to the United States of America income tax of, at least, approximately \$317,262.

4. By reason of this income, RAKESH ANAND and MEENA ANAND were required by law, following the close of the calendar year 2007, and on or before October 15, 2008 per an extension to make an income tax return to the Internal Revenue Service and to pay the income tax due and owing thereon.

5. Throughout calendar year 2007 and continuing to on or about September 24, 2008, in the Northern District of Indiana, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, well knowing all of the foregoing facts, did willfully attempt to evade and defeat the income tax due and owing by them to the United States of America for the 2007 calendar year by committing the following affirmative acts of evasion:

a. giving their income tax return preparer false hand-written documents that substantially understated their gross income ;

b. filing a joint Federal income tax return, Form 1040, which falsely stated on Schedule C (Profit or Loss from Business), line 1, that their business had gross receipts and sales of \$526,410, when in fact as defendants well knew that the gross receipts and sales from the DWLCs were substantially more than \$526,410; and

c. failing to pay approximately \$260,360 to the Internal Revenue Service, the additional tax due and owing on their true taxable income;

In violation of Title 26, United States Code, Section 7201.

COUNT THIRTY-FIVE

The SPECIAL MAY 2010 GRAND JURY further charges:

1. The GRAND JURY realleges and incorporates by reference paragraph 1 of Count THIRTY-ONE of this Indictment.

2. During the calendar year 2008, DWLCs had gross receipts of, at least, approximately \$1,335,333, and RAKESH ANAND and MEENA ANAND had taxable income of, at least, approximately \$907,199.

3. Upon this taxable income, RAKESH ANAND and MEENA ANAND owed to the United States of America income tax of, at least, approximately \$324,883.

4. By reason of this income, RAKESH ANAND and MEENA ANAND were required by law, following the close of the calendar year 2008, and on or before October 15, 2009 per an extension to make an income tax return to the Internal Revenue Service and to pay the income tax due and owing thereon.

5. Throughout calendar year 2008 and continuing to on or about October 5, 2009, in the Northern District of Indiana, and elsewhere,

RAKESH ANAND and
MEENA ANAND,

defendants herein, well knowing all of the foregoing facts, did willfully attempt to evade and defeat the income tax due and owing by them to the United States of America for the 2008 calendar year by committing the following affirmative acts of evasion:

a. giving their income tax return preparer false hand-written documents that substantially understated their gross income;

b. filing a joint Federal income tax return, Form 1040, which falsely stated on Schedule C (Profit or Loss from Business), line 1, that their business had gross receipts and sales of \$662,390, when in fact as defendants well knew that the gross receipts and sales from the DWLCs were substantially more than \$662,390;

c. failing to pay approximately \$248,982 to the Internal Revenue Service, the additional tax due and owing on their true taxable income;

In violation of Title 26, United States Code, Section 7201.

FORFEITURE ALLEGATION ONE

The SPECIAL MAY 2010 GRAND JURY alleges:

1. The allegations of Counts One through Seven of this Indictment are realleged and fully incorporated here for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

2. As a result of their violations of Title 21, United States Code, Sections 846 and 841(a)(1), as alleged in Counts One through Seven of the foregoing Indictment,

RAKESH ANAND and
MEENA ANAND,

defendants herein, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853(a)(1) and (2), any and all property constituting or derived from any proceeds obtained, directly or indirectly, as a result of said violations, and (2) any and all property used, and intended to be used, in any manner or part to commit and to facilitate the commission of said violations.

3. The interests of the defendants subject to forfeiture to the United States, pursuant to Title 21, United States Code, Section 853(a)(1) and (2), include but are not limited to (a) approximately 55 pieces of jewelry with an approximate value of \$71,055 seized on or about May 20, 2010, and (b) approximately \$6,300,000 representing proceeds of the unlawful drug distribution activities alleged in Counts One through Seven of the foregoing Indictment, including but not limited to:

(1) approximately \$713,026 seized on or about May 20, 2010 from the Anand residence;

(2) approximately \$53,950 seized on or about May 20, 2010 from a safe deposit box at the Bank of America;

(3) at least approximately \$162,294 restrained in Bank Financial Checking Account # XXXXXX6065 on or about May 20, 2010;

(4) at least approximately \$19,715 restrained in Bank Financial Checking Account # XXXXXX0716 on or about May 20, 2010;

(5) at least approximately \$215,022 restrained in Bank Financial CD Account # XXXXXX0235 on or about May 20, 2010;

(6) at least approximately \$209,831 restrained in Bank Financial Account # Account # XXXXXX7407 (now Account # XXXXXX2078) on or about May 20, 2010;

(7) at least approximately \$324,809 restrained in Bank Financial Account # XXXXXX2182 on or about May 20, 2010;

(8) at least approximately \$274,921 restrained in JP Morgan Chase Bank NA Certificate of Deposit # XXXXXXXXX1798 on or about May 20, 2010;

(9) at least approximately \$505 restrained in JP Morgan Chase Bank NA, Chase Premier Platinum Checking Account # XXXXXX2212 on or about May 20, 2010;

(10) at least approximately \$293,465 restrained in Harris Bank NA Certificate of Deposit # XXXXXX9633 on or about May 20, 2010;

(11) at least approximately \$316,661 restrained in Charles Schwab, Schwab One

Trust Account (CD's) # XXXX-4845, on or about May 20, 2010;

(12) at least approximately \$954,759 restrained in Charles Schwab, Schwab One

Trust Account (Mutual Funds) # XXXX-9039 on or about May 20, 2010;

(13) at least approximately \$81,229 restrained in Fifth Third Bank Certificate of Deposit # XXXXX3773 on or about May 20, 2010;

(14) at least approximately \$81,229 restrained in Fifth Third Bank Certificate of Deposit # XXXXX3781 on or about May 20, 2010;

(15) at least approximately \$87,501 restrained in Fifth Third Bank Certificate of Deposit # XXXXX6195 on or about May 20, 2010;

(16) at least approximately \$87,501 restrained in Fifth Third Bank Certificate of Deposit # XXXXX6187 on or about May 20, 2010;

(17) at least approximately \$103,748 restrained in Bank of America Certificate of Deposit # XXXXXXXXXXX4203 on or about May 20, 2010;

(18) at least approximately \$162,499 restrained in TCF Bank Certificate of Deposit # XXXXXX8881 on or about May 20, 2010; and

(19) at least approximately \$236,139 restrained in George Washington Savings Bank Certificate of Deposit # XXXXXXX1975 on or about May 20, 2010.

4. If any of the property and funds subject to forfeiture pursuant to Title 21, United States Code, Section 853(a), 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 to seek forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 21, United States Code, Section 853.

FORFEITURE ALLEGATION TWO

The SPECIAL MAY 2010 GRAND JURY further alleges:

1. The allegations of Counts Twenty-Eight through Thirty of this Indictment are realleged and incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 982(a)(1).

2. As a result of their violations of Title 18, United States Code, Section 1957, as alleged in the foregoing Indictment,

RAKESH ANAND and
MEENA ANAND,

defendants herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all right, title, and interest defendants have in any property, real and personal, involved in such offenses and any property traceable to such property.

3. The interests of the defendants, jointly and severally, subject to forfeiture include, but are not limited to, approximately \$827,721, including:

(a) at least approximately \$236,139 restrained in George Washington Savings Bank Certificate of Deposit # XXXXXXXX1975 on or about May 20, 2010;

(b) at least approximately \$274,921 restrained in JP Morgan Chase Bank NA Certificate of Deposit # XXXXXXXX1798 on or about May 20, 2010; and

(c) at least approximately \$316,661 restrained in Charles Schwab, Schwab One Trust Account (CD's) # XXXX-4845, on or about May 20, 2010;

4. If any of the property subject to forfeiture and described above, 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 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,

the United States of America shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1).

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY