AJM/2009R00879

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA	:	Hon. Dickinson R. Debevoise
	:	
v.	:	Criminal No. 09-878
	:	
ABDUL WILLIAMS, a/k/a "Mu,"	:	
a/k/a "Mutallib,"	:	18 U.S.C. §§ 2; 371; 922(g)(1);
CLIFFORD J. MINOR, and	:	924(d); 1001(a)(2); 1512(c)(2);
JAMAL MUHAMMAD,	:	1519; 1952(a)(3) & 1621(1);
a/k/a "Marlan"	:	28 U.S.C. § 2461(c)

SECOND SUPERSEDING INDICTMENT

The Grand Jury in and for the District of New Jersey, sitting at Newark, charges:

COUNT 1
(Unlawful Possession of Firearm by Convicted Felon)
(Defendant Williams)

On or about June 8, 2007, in Essex County, in the District of New Jersey, and elsewhere, defendant

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely, a North American Arms Corporation .22 caliber Long Rifle Revolver, serial number B48544.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2
(Unlawful Possession of Firearm by Convicted Felon)
(Defendant Williams)

On or about July 15, 2008, in Essex County, in the District of New Jersey, and elsewhere, defendant

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"

having been convicted of a crime punishable by imprisonment for a term exceeding one year in a court in the State of New Jersey, did knowingly possess in and affecting commerce a firearm, namely, a Beretta 96 Centurion .40 caliber semi-automatic pistol, serial number Ber044399.

In violation of Title 18, United States Code, Section 922(g)(1).

COUNT 3
(Conspiracy to Use Interstate Facility to Facilitate Bribery)
(Defendants Williams, Minor and Muhammad)

1. On or about June 8, 2007, defendant ABDUL WILLIAMS was arrested by Newark police officers and charged with possession of a firearm by a convicted felon, in violation of New Jersey Criminal Code Section 2C:39-7. As a result of this charge, beginning on or about June 20, 2007, defendant ABDUL WILLIAMS was incarcerated at the Essex County Jail.

2. As a repeat, convicted felon, defendant ABDUL WILLIAMS knew that, were he to be convicted of the June 8, 2007, charge for firearm possession, he would be imprisoned for a lengthy period of time.

3. From in or about June 2007 through on or about January 29, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendants

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"
CLIFFORD J. MINOR, and
JAMAL MUHAMMAD, a/k/a "Marlan,"

did knowingly and intentionally conspire and agree with each other and others to use facilities in interstate commerce, and to cause the use of facilities in interstate commerce, with the intent to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, namely, bribery, contrary to New Jersey Criminal Code, Section 2C:28-5, and to thereafter perform an act

to promote, manage, establish, carry on and facilitate the promotion, management, establishment, and carrying on of such unlawful activity, contrary to Title 18, United States Code, Section 1952(a)(3).

Object of the Conspiracy

4. It was the object of the conspiracy for defendants to hinder the prosecution of the case filed in Essex County Superior Court on or about June 8, 2007, against defendant ABDUL WILLIAMS, by bribing defendant JAMAL MUHAMMAD to falsely confess to possession of the firearm in question.

Manner and Means of the Conspiracy

5. It was a method and means of the conspiracy that defendants ABDUL WILLIAMS, CLIFFORD J. MINOR and JAMAL MUHAMMAD used facilities in interstate commerce, and caused others to use facilities in interstate commerce, to carry out a plan whereby defendant JAMAL MUHAMMAD, in return for a bribe, would falsely confess that he possessed the firearm in question on June 8, 2007, thereby exculpating defendant ABDUL WILLIAMS.

6. It was a method and means of the conspiracy that defendant CLIFFORD J. MINOR, an attorney admitted to practice under the laws of the State of New Jersey, accepted a $3,500 payment from defendant ABDUL WILLIAMS -- then incarcerated at the Essex County Jail -- to escort defendant JAMAL MUHAMMAD to the Newark Police Department to confess to possession of the firearm

for which defendant ABDUL WILLIAMS was arrested on June 8, 2007, a crime that defendant CLIFFORD J. MINOR knew defendant JAMAL MUHAMMAD had not committed.

7. It was a method and means of the conspiracy that, on or about July 5, 2007 -- the same day he first met defendant JAMAL MUHAMMAD -- defendant CLIFFORD J. MINOR, having been paid by defendant ABDUL WILLIAMS but purporting to act as defendant JAMAL MUHAMMAD's attorney, brought defendant JAMAL MUHAMMAD to the Newark Police Department, where defendant JAMAL MUHAMMAD falsely claimed to law enforcement that he possessed the firearm in question on June 8, 2007.

8. It was a method and means of the conspiracy that defendants ABDUL WILLIAMS, CLIFFORD J. MINOR and JAMAL MUHAMMAD agreed that, if necessary, they would take steps to further obstruct justice and conceal the true underlying facts were there to be a later investigation by law enforcement.

Overt Acts

9. On or about June 21, 2007, defendants ABDUL WILLIAMS and JAMAL MUHAMMAD used a facility in interstate commerce, namely, the telephone, to rehearse defendant JAMAL MUHAMMAD's false confession. During that conversation, defendant JAMAL MUHAMMAD told defendant ABDUL WILLIAMS, "Just make do out for me, you know what I mean, and I'll make do out for you." Defendant ABDUL WILLIAMS replied, "I got you."

10. On or about July 3, 2007, defendant CLIFFORD J. MINOR met with defendant ABDUL WILLIAMS at the Essex County Jail. During that meeting, defendant CLIFFORD J. MINOR agreed that, in exchange for a $3,500 payment from defendant ABDUL WILLIAMS, he would facilitate defendant JAMAL MUHAMMAD's false confession to law enforcement by purporting to act as defendant JAMAL MUHAMMAD's attorney.

11. On or about July 4, 2007, defendant ABDUL WILLIAMS used a facility in interstate commerce, namely, the telephone, to direct payment of $2,000 to defendant CLIFFORD J. MINOR.

12. On or about July 5, 2007, defendants CLIFFORD J. MINOR and ABDUL WILLIAMS used a facility in interstate commerce, namely, the telephone, to discuss the circumstances of defendant JAMAL MUHAMMAD's statement later that day. Defendant CLIFFORD J. MINOR advised defendant ABDUL WILLIAMS that he would be escorting defendant JAMAL MUHAMMAD to the Newark Police Department at 5:30 p.m. that evening to make a statement regarding possession of the firearm for which defendant ABDUL WILLIAMS had been arrested on June 8, 2007. When asked by defendant ABDUL WILLIAMS whether he would then be "cleared on the situation," defendant CLIFFORD J. MINOR acknowledged that there would be "two people being arrested for the same thing at different times, one claiming that is their's."

13. In their June 5, 2007, telephone conversation, defendants CLIFFORD J. MINOR and ABDUL WILLIAMS also discussed defendant ABDUL WILLIAMS' payment to defendant CLIFFORD J. MINOR. Defendant CLIFFORD J. MINOR advised defendant ABDUL WILLIAMS that he had received "a light number," i.e., only $2,000 of the agreed $3,500 payment, and instructed defendant ABDUL WILLIAMS to pay the outstanding amount to defendant CLIFFORD J. MINOR's assistant.

14. On or about July 5, 2007, defendant ABDUL WILLIAMS used a facility in interstate commerce, namely, the telephone, to direct payment of the remaining $1,500 to defendant CLIFFORD J. MINOR.

15. On or about July 5, 2007, defendant JAMAL MUHAMMAD, having solicited, accepted or agreed to accept a benefit in consideration thereof, falsely claimed to Newark police officers, in substance and in part, that he possessed the firearm in question on June 8, 2007, in an attempt to exculpate defendant ABDUL WILLIAMS. Defendant CLIFFORD J. MINOR accompanied and purported to represent defendant JAMAL MUHAMMAD in connection with the making of his false confession.

16. On or about July 6, 2007, defendants CLIFFORD J. MINOR and ABDUL WILLIAMS used a facility in interstate commerce, namely, the telephone, to make arrangements for the posting of defendant JAMAL MUHAMMAD's bail. Defendant CLIFFORD

J. MINOR advised defendant ABDUL WILLIAMS that, among other things, he had received the remainder of the agreed $3,500 payment. When asked by defendant ABDUL WILLIAMS whether defendant JAMAL MUHAMMAD "was charged with it and cleared me of it," defendant CLIFFORD J. MINOR replied, "that's what the whole point was." Defendant CLIFFORD J. MINOR further advised defendant ABDUL WILLIAMS that, "You asked me to do, you know, and I did it." Defendant CLIFFORD J. MINOR told defendant ABDUL WILLIAMS that, as a result, defendant ABDUL WILLIAMS could have his then-attorney clear defendant ABDUL WILLIAMS on the June 8, 2007, firearm possession charge by "saying like look, you know, this guy came in and said that he had the gun, that my client didn't have the gun. He was brought in by his lawyer and he's been charged with this crime."

17. On or about July 9, 2007, defendant ABDUL WILLIAMS and defendant JAMAL MUHAMMAD used a facility in interstate commerce, namely, the telephone, to make arrangements for the payment of $1,500 to defendant JAMAL MUHAMMAD in consideration of defendant JAMAL MUHAMMAD's having made the false confession.

18. On or about July 15, 2007, defendant CLIFFORD J. MINOR met with defendant ABDUL WILLIAMS at the Essex County Jail. During that meeting, defendant CLIFFORD J. MINOR discussed with defendant ABDUL WILLIAMS that he would seek to have defendant JAMAL MUHAMMAD plead guilty as soon as possible in an attempt to

resolve the pending firearm possession charge against defendant ABDUL WILLIAMS.

19. On or about December 21, 2009, defendant CLIFFORD J. MINOR was served with a grand jury subpoena for production of documents concerning his purported representation of defendant JAMAL MUHAMMAD. Pursuant to that subpoena, on or about December 21, 2009, defendant CLIFFORD J. MINOR manufactured and produced to the United States Attorney's Office a false "Agreement to Provide Legal Services," dated July 5, 2007, executed by defendants CLIFFORD J. MINOR and JAMAL MUHAMMAD.

20. On or about January 7, 2010, defendant CLIFFORD J. MINOR again produced to the United States Attorney's Office the false "Agreement to Provide Legal Services," purportedly dated July 5, 2007.

21. On or about January 29, 2010, in lieu of an appearance before the grand jury, defendant CLIFFORD J. MINOR agreed to voluntarily meet with agents of the Federal Bureau of Investigation and Assistant United States Attorneys at the United States Attorney's Office. Appearing voluntarily and represented by counsel, defendant CLIFFORD J. MINOR made the following false statements under oath:

a. He had no communications with defendant ABDUL WILLIAMS concerning his representation of defendant JAMAL MUHAMMAD at any time;

b. He had been retained by defendant JAMAL MUHAMMAD;

c. He had been paid $500 by defendant JAMAL MUHAMMAD for the representation;

d. He met with defendant JAMAL MUHAMMAD prior to July 5, 2007;

e. He had no indication that defendant JAMAL MUHAMMAD's July 5, 2007, statement was made in return for any kind of consideration, benefit or payment;

f. He has never been involved in any case involving defendant ABDUL WILLIAMS;

g. He had no communications with representatives or employees of defendant ABDUL WILLIAMS' then-attorney, P.B., regarding his representation of defendant JAMAL MUHAMMAD; and

h. With respect to the "Agreement to Provide Legal Services," dated July 5, 2007, he stated:

> "These documents were prepared after the entire conversations I had in your office, the time that you indicated to me that you were going to go forward with an obstruction agreement, obstruction case against Mr. Muhammad. These documents were prepared primarily, from my point of view, to memorialize the retainer amounts. They were memorialized for the retainer amounts more so than for the agreement because [defendant JAMAL MUHAMMAD] and I had a clear understanding as to what our representation was going to be."

All in violation of Title 18, United States Code, Section 371.

COUNTS 4-5
(Use of Interstate Facility to Facilitate Bribery)
(Defendants Williams, Minor and Muhammad)

1. Paragraphs 5 through 21 of Count 3 of this Second Superseding Indictment are hereby realleged and incorporated as though set forth in full herein.

2. On or about the dates set forth below, in Essex County, in the District of New Jersey, and elsewhere, the defendants set forth below did knowingly and intentionally use facilities in interstate commerce, and cause the use of facilities in interstate commerce, with the intent to promote, manage, establish, carry on, or facilitate the promotion, management, establishment, and carrying on, of an unlawful activity, that is, bribery, contrary to New Jersey Criminal Code, Section 2C:28-5, and to thereafter, perform and attempt to perform an act to promote, manage, establish, carry on and facilitate the promotion, management, establishment, or carrying on of such unlawful activity, as follows:

COUNT	DEFENDANT(S)	USE OF INTERSTATE FACILITY	SUBSEQUENT ACT(S)
4	WILLIAMS & MUHAMMAD	Use of telephone on June 21, 2007, as alleged in Paragraph 9 of Count 3	(a) Defendant MUHAMMAD made a false confession to law enforcement on July 5, 2007 (b) Defendant WILLIAMS directed the payment of a bribe to defendant MUHAMMAD
5	WILLIAMS & MINOR	Use of telephone on July 5, 2007, as alleged in Paragraphs 12 and 13 of Count 3	(a) Defendant WILLIAMS directed the payment of $1,500 to defendant MINOR (b) Defendant MINOR purported to act as defendant MUHAMMAD's attorney in connection with defendant MUHAMMAD's July 5, 2007, false statement to law enforcement

In violation of Title 18, United States Code, Section 1952(a)(3) and Section 2.

COUNT 6
(Obstruction of Official Proceeding)
(Defendant Minor)

1. Paragraphs 5 through 21 of Count 3 of this Second Superseding Indictment are hereby realleged and incorporated as though set forth in full herein.

2. In or about August 2009, the United States Attorney's Office for the District of New Jersey, the Federal Bureau of Investigation, and a federal grand jury sitting in Newark, New Jersey, commenced an investigation into the circumstances of defendant JAMAL MUHAMMAD's July 5, 2007, false confession to Newark police officers.

3. On or about November 17, 2009, a request was made of defendant CLIFFORD J. MINOR by the United States Attorney's Office and the Federal Bureau of Investigation for documents concerning his purported representation of defendant JAMAL MUHAMMAD.

4. On or about December 21, 2009, defendant CLIFFORD J. MINOR was served with a grand jury subpoena for documents concerning his purported retention by defendant JAMAL MUHAMMAD. The grand jury subpoena directed defendant CLIFFORD J. MINOR to produce, among other things, any retention agreement and all documents relating to the amount and source of any fees received by defendant CLIFFORD J. MINOR for the representation.

5. On or about December 21, 2009, in response to the grand jury subpoena, defendant CLIFFORD J. MINOR manufactured and produced an "Agreement to Provide Legal Services," purportedly dated July 5, 2007, between defendant CLIFFORD J. MINOR and defendant JAMAL MUHAMMAD. The document falsely stated that defendant JAMAL MUHAMMAD had paid defendant CLIFFORD J. MINOR the sum of $500 to represent him in connection with his confession to Newark police officers.

6. On or about January 7, 2010, in response to the grand jury subpoena, defendant CLIFFORD J. MINOR again produced the false "Agreement to Provide Legal Services," dated July 5, 2007.

7. On or about January 29, 2010, in lieu of an appearance before the grand jury, defendant CLIFFORD J. MINOR agreed to voluntarily meet with agents of the Federal Bureau of Investigation and Assistant United States Attorneys at the United States Attorney's office. Appearing voluntarily and represented by counsel, defendant CLIFFORD J. MINOR made the following false statements under oath:

a. He had no communications with defendant ABDUL WILLIAMS concerning his representation of defendant JAMAL MUHAMMAD at any time;

b. He had been retained by defendant JAMAL MUHAMMAD;

c. He had been paid $500 by defendant JAMAL MUHAMMAD for the representation;

d. He met with defendant JAMAL MUHAMMAD prior to July 5, 2007;

e. He had no indication that defendant JAMAL MUHAMMAD's July 5, 2007, statement was made in return for any kind of consideration, benefit or payment;

f. He has never been involved in any case involving defendant ABDUL WILLIAMS;

g. He had no communications with representatives or employees of defendant ABDUL WILLIAMS' then-attorney, P.B., regarding his representation of defendant JAMAL MUHAMMAD; and

h. With respect to the "Agreement to Provide Legal Services," dated July 5, 2007, he stated:

> "These documents were prepared after the entire conversations I had in your office, the time that you indicated to me that you were going to go forward with an obstruction agreement, obstruction case against Mr. Muhammad. These documents were prepared primarily, from my point of view, to memorialize the retainer amounts. They were memorialized for the retainer amounts more so than for the agreement because [defendant JAMAL MUHAMMAD] and I had a clear understanding as to what our representation was going to be."

8. From on or about December 21, 2009, through on or about January 29, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

CLIFFORD J. MINOR,

did corruptly obstruct, influence, and impede, and attempt to obstruct, influence, and impede, an official proceeding, namely, the grand jury's, the United States Attorney's Office's, and the FBI's investigation into the circumstances of defendant JAMAL MUHAMMAD's false confession to Newark police officers, in violation of Title 18, United States Code, Section 1512(c)(2).

COUNT 7
(Falsification of Records)
(Defendant Minor)

1. Paragraphs 5 through 21 of Count 3 and paragraphs 2 through 7 of Count 6 of this Second Superseding Indictment are hereby realleged and incorporated as though set forth in full herein.

2. On or before December 21, 2009, in Essex County, in the District of New Jersey, and elsewhere, defendant

CLIFFORD J. MINOR,

did knowingly alter, destroy, conceal, cover up, falsify, and make a false entry in any record, document, and tangible object, namely, the "Agreement to Provide Legal Services," dated July 5, 2007, between defendant CLIFFORD J. MINOR and defendant JAMAL MUHAMMAD, with the intent to impede, obstruct, and influence the investigation and proper administration of a matter within the jurisdiction of a department and agency of the United States, namely, the investigation into the circumstances of defendant JAMAL MUHAMMAD's false confession to Newark police officers.

In violation of Title 18, United States Code, Section 1519.

COUNT 8
(Perjury)
(Defendant Minor)

1. Paragraphs 5 through 21 of Count 3 and paragraphs 2 through 7 of Count 6 of this Second Superseding Indictment are hereby realleged and incorporated as though set forth in full herein.

2. On or about January 29, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

CLIFFORD J. MINOR,

having taken an oath before a competent tribunal, officer, or person, in a case in which a law of the United States authorizes an oath to be administered, that he would testify truthfully, did knowingly and willfully and contrary to that oath state a material matter which he did not believe to be true, that is, defendant CLIFFORD J. MINOR gave the following materially false testimony:

a. He had no communications with defendant ABDUL WILLIAMS concerning his representation of defendant JAMAL MUHAMMAD at any time;

b. He had been retained by defendant JAMAL MUHAMMAD;

c. He had been paid $500 by defendant JAMAL MUHAMMAD for the representation;

d. He met with defendant JAMAL MUHAMMAD prior to

July 5, 2007;

e. He had no indication that defendant JAMAL MUHAMMAD's July 5, 2007, statement was made in return for any kind of consideration, benefit or payment;

f. He has never been involved in any case involving defendant ABDUL WILLIAMS;

g. He had no communications with representatives or employees of defendant ABDUL WILLIAMS' then-attorney, P.B., regarding his representation of defendant JAMAL MUHAMMAD; and

h. With respect to the "Agreement to Provide Legal Services," dated July 5, 2007, he stated:

> "These documents were prepared after the entire conversations I had in your office, the time that you indicated to me that you were going to go forward with an obstruction agreement, obstruction case against Mr. Muhammad. These documents were prepared primarily, from my point of view, to memorialize the retainer amounts. They were memorialized for the retainer amounts more so than for the agreement because [defendant JAMAL MUHAMMAD] and I had a clear understanding as to what our representation was going to be."

In violation of Title 18, United States Code, Section 1621(1).

COUNT 9
(False Statements)
(Defendant Minor)

1. Paragraphs 5 through 21 of Count 3 and paragraphs 2 through 7 of Count 6 of this Second Superseding Indictment are hereby realleged and incorporated as though set forth in full herein.

2. On or about January 29, 2010, in Essex County, in the District of New Jersey, and elsewhere, defendant

CLIFFORD J. MINOR,

in a matter within the jurisdiction of the executive and judicial branch of the Government of the United States, knowingly and willfully made materially false, fictitious, and fraudulent statements and representations, that is, defendant CLIFFORD J. MINOR made the following materially false statements:

a. He had no communications with defendant ABDUL WILLIAMS concerning his representation of defendant JAMAL MUHAMMAD at any time;

b. He had been retained by defendant JAMAL MUHAMMAD;

c. He had been paid $500 by defendant JAMAL MUHAMMAD for the representation;

d. He met with defendant JAMAL MUHAMMAD prior to July 5, 2007;

e. He had no indication that defendant JAMAL

MUHAMMAD's July 5, 2007, statement was made in return for any kind of consideration, benefit or payment;

f. He has never been involved in any case involving defendant ABDUL WILLIAMS;

g. He had no communications with representatives or employees of defendant ABDUL WILLIAMS' then-attorney, P.B., regarding his representation of defendant JAMAL MUHAMMAD; and

h. With respect to the "Agreement to Provide Legal Services," dated July 5, 2007, he stated:

> "These documents were prepared after the entire conversations I had in your office, the time that you indicated to me that you were going to go forward with an obstruction agreement, obstruction case against Mr. Muhammad. These documents were prepared primarily, from my point of view, to memorialize the retainer amounts. They were memorialized for the retainer amounts more so than for the agreement because [defendant JAMAL MUHAMMAD] and I had a clear understanding as to what our representation was going to be."

In violation of Title 18, United States Code, Section 1001(a)(2).

FORFEITURE ALLEGATIONS

1. The allegations contained on page one and two of this Second Superseding Indictment are incorporated by reference as though set forth in full herein for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g) set forth on page one of this Superseding Indictment, the defendant,

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of that offense, including the following:

North American Arms Corporation .22 caliber Long Rifle Revolver, serial number B48544, and five .22 caliber bullets.

3. Upon conviction of the offense in violation of Title 18, United States Code, Section 922(g) set forth on page two of this Superseding Indictment, the defendant,

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"

shall forfeit to the United States any firearms and ammunition involved in or used in the commission of that offense, including the following:

Beretta 96 Centurion .40 caliber semi-automatic pistol, serial number Ber044399, and eleven .40 caliber bullets.

All pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

4. As the result of committing the aforementioned offenses in violation of Title 18, United States Code, Section 1952(a)(3), as alleged in this Second Superseding Indictment, defendants

ABDUL WILLIAMS, a/k/a "Mu,"
a/k/a "Mutallib,"
CLIFFORD J. MINOR, and
JAMAL MUHAMMAD, a/k/a "Marlan,"

shall forfeit to the United States pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of the offenses. If more than one defendant is convicted of an offense, the defendants so convicted are jointly and severally liable for the amount subject to forfeiture under this paragraph.

If any of the above-described forfeitable property, as a result of any act or omission of defendants ABDUL WILLIAMS, CLIFFORD J. MINOR and JAMAL MUHAMMAD:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of defendants ABDUL WILLIAMS, CLIFFORD J. MINOR and JAMAL MUHAMMAD up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 981 and Title 28, United States Code, Section 2461.

A TRUE BILL

PAUL J. FISHMAN
United States Attorney