

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**UNITED STATES OF AMERICA** : **CRIMINAL NO. 11-**  
**v.** : **DATE FILED: August 16, 2011**  
**STEPHEN BROOKS** : **VIOLATION:**  
: **18 U.S.C. §1956(a)(1)(A)(i) (laundering**  
: **monetary instruments - 1 count)**  
: **Notice of forfeiture**

**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

1. On or about June 19, 2011, in Philadelphia, in the Eastern District of Pennsylvania, defendant

**STEPHEN BROOKS**

knowingly conducted and attempted to conduct a financial transaction affecting interstate commerce, that is, the delivery of approximately \$200,180 in United States currency, knowing that the property involved in that transaction represented the proceeds of some form of unlawful activity.

2. The financial transaction described in paragraph 1 above involved the proceeds of specified unlawful activity, that is, the distribution of controlled substances, in violation of Title 21, United States Code, Section 841, and the defendant acted with the intent to promote the carrying on of specified unlawful activity.

In violation of Title 18, United States Code, Section 1956(a)(1)(A)(i).

## NOTICE OF FORFEITURE

### THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violation of Title 18, United States Code, Section 1956, set forth in this indictment, defendant

#### **STEPHEN BROOKS**

shall forfeit to the United States of America any and all property involved in such offense, and any property traceable to such property, including, but not limited to:

- (a) U.S. Currency in the sum of \$200,180.00;
- (b) A gold 2005 Lexus automobile, Model ES330, with VIN number JTHBA30G455060490

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

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(a)(1), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant(s) up to the value of the property subject to forfeiture.

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

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**ZANE DAVID MEMEGER  
UNITED STATES ATTORNEY**