



**NOTICE OF FORFEITURE**

**THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:**

1. As a result of the violation of Title 18, United States Code, Section 1955 set forth in this information, defendant

**JOSEPH KELLY**

shall forfeit to the United States of America any property that constitutes, or is derived from, proceeds obtained directly or indirectly from the commission of such offenses, including, but not limited to:

- (a) the sum of \$175,000 seized from Citizens Bank, Safe Deposit Box #1329, 2014 Cottman Avenue, Philadelphia, Pennsylvania, on April 21, 2010.
- (b) the sum of \$3,335 seized from 424 Mark Place, Philadelphia, Pennsylvania, on April 21, 2010.

2. The defendant agrees to waive any claim to and not contest the forfeiture of United States currency that was seized from:

- (a) M&T Bank, Safe Deposit Box # 733, 1817 Street Road, Bensalem, PA, on April 21, 2010;
- (b) First Trust National Bank, Safe Deposit Box # 4096, 1931 Cottman Avenue, Philadelphia, PA, on April 21, 2010; and
- (c) 221 Shoemaker Road, Huntingdon Valley, PA, on April 21, 2010.

3. 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(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Sections 982(a)(2) and 1955(d).

  
**ZANE DAVID MEMEGER**  
United States Attorney