

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

UNITED STATES OF AMERICA	:	CRIMINAL NO. 12-_____
	:	
v.	:	DATE FILED: _____
	:	
DORIS WHITFIELD RICHARDSON	:	VIOLATIONS:
	:	18 U.S.C. § 641 (conversion of government
	:	funds – 4 counts)
	:	18 U.S.C. § 1343 (wire fraud - 8 counts)
	:	42 U.S.C. § 1383a(a)(3)(A) (Social Security
	:	fraud - 1 count)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

(Conversion of Government Funds)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

1. The Office of Personnel Management (“OPM”) was a federal agency that administered the Civil Service Retirement System (“CSRS”) annuity benefits program. Under this program, CSRS annuity benefits were paid to a covered federal employee, or annuitant, who met certain requirements for entitlement upon retirement from civil service. When the annuitant died, a surviving family member was not entitled to receive the annuity unless he or she applied to, and was approved by, OPM. However, prior to retirement, an annuitant had the option to choose a spousal benefit, where upon the annuitant’s death, a lesser portion of the annuity would

be transferred to the surviving spouse or family member. The maximum spousal survivor benefit could not exceed 55% of the retirement benefit paid to the retired federal employee. There were no benefits for the surviving children, except for children under 18 years of age; 22 years of age if a full-time student; or if the child had a confirmed medical illness which limited him/her to properly care for themselves. A survivor annuity was payable only upon OPM's approval of an application from the eligible family member.

2. CSRS annuity benefits were paid from the Civil Service Retirement and Disability Fund, which was funded primarily from payroll contributions paid by civil service workers, and the Federal Government, who made matching contributions. Benefits paid from this fund were disbursed by the United States Department of the Treasury.

3. Defendant DORIS WHITFIELD RICHARDSON's grandfather, identified herein as "J.W.," was a government employee who qualified for CSRS benefits prior to his death. Subsequent to J.W.'s death in 1978, his widow, identified herein as "H.W.," applied for, and was subsequently approved for, survivor CSRS benefits. H.W. was the grandmother of defendant WHITFIELD RICHARDSON. CSRS benefits were paid by U.S. Treasury checks issued to H.W.

4. H.W. died on or about April 6, 1986. At that time, her entitlement to CSRS benefits ended. Defendant DORIS WHITFIELD RICHARDSON was not entitled to any CSRS benefits on the basis of her grandfather's service.

DEFENDANT'S THEFT AND CONVERSION OF CSRS BENEFITS

5. OPM was not timely notified of H.W.'s death and continued to mail H.W.'s benefit checks. From in or about April 1986 to in or about April 1999, benefit checks

were mailed from the U.S. Treasury Department to Hannah Whitfield at several addresses, including 1255 N. Hollywood Street, Philadelphia, PA 19121; 3000 N. Taney Street, Philadelphia, PA 19121; and P.O. Box 3248, Philadelphia, PA 19130. P.O. Box 3248 was opened in H.W.'s name, after her death, and the name "Doris Whitfield" was also listed on the account as a person authorized to receive mail directed to that P.O. Box.

6. On or about April 1, 1998, defendant DORIS WHITFIELD RICHARDSON opened two bank accounts with River City Bank under the name and Social Security number of H.W., and used the address P.O. Box 3248, Philadelphia, PA 19130.

7. In or about May 1999, defendant DORIS WHITFIELD RICHARDSON contacted OPM and requested that H.W.'s OPM benefit payments be electronically deposited into a River City Bank account, and they continued to be paid into this account until in or about September 2004. During this time, payments were wired from the OPM's San Francisco Financial Services Center in Emeryville, California to defendant WHITFIELD RICHARDSON's account with River City Bank, which received the payments in Louisville, Kentucky, and defendant WHITFIELD RICHARDSON received these payments via cashier's check in the Eastern District of Pennsylvania.

8. In or about October 2004 defendant DORIS WHITFIELD RICHARDSON contacted OPM and requested that H.W.'s OPM benefit payments be electronically deposited into a M&T Bank account, in which her granddaughter, "S.T." was listed as a minor on the account with defendant WHITFIELD RICHARDSON listed as custodian. She continued to have these payments paid into this account until on or about May 1, 2007. During this time, payments were wired from the OPM's San Francisco Financial Services Center in Emeryville, California to

defendant WHITFIELD RICHARDSON's account with M&T Bank, which received the payments in Amherst, New York and directed them to defendant WHITFIELD RICHARDSON's bank account in the Eastern District of Pennsylvania.

9. From in or about May 1986 through in or about May 2007, defendant DORIS WHITFIELD RICHARDSON fraudulently converted H.W.'s CSRS benefit payments, and never notified OPM that H.W. had died.

10. In or about May 2007, OPM learned of H.W.'s death, and terminated her benefit payments.

11. Defendant DORIS WHITFIELD RICHARDSON improperly received and converted to her own use approximately \$161,757.24 in CSRS benefit payments that were intended for H.W., who was deceased.

12. From in or about May 1986 and continuing through in or about May 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

knowingly stole and converted to her own use money of the United States in excess of \$1,000, that is, approximately \$161,757.24 in CSRS payments that were intended for H.W., who was deceased.

In violation of Title 18, United States Code, Section 641.

COUNT TWO

(Conversion of Government Funds)

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this indictment:

1. The Department of Veterans Affairs (“VA”), an agency of the United States, by and through the Veterans Benefits Administration, administered certain service-related benefit programs, including a pension plan for service members, their widow/ers, and/or child(ren), pursuant to Title 38, United States Code, Sections 1501-42.

2. Defendant DORIS WHITFIELD RICHARDSON’s grandfather, J.W., was a service member entitled to a pension from the VA. J.W. died on or about December 6, 1978. On or about December 8, 1978, J.W.’s widow, H.W., who was defendant WHITFIELD RICHARDSON’s grandmother, applied for and subsequently received a VA death pension known as the “306 Old Law Widow’s Death Pension.” Benefits paid from this fund were disbursed by the United States Department of the Treasury, through the issuance of U.S. Treasury checks to H.W.

3. H.W. died on or about April 6, 1986. At that time, her entitlement to VA death pension benefits ended, and defendant DORIS WHITFIELD RICHARDSON was not entitled to any VA pension benefits relating to her grandfather’s service.

DEFENDANT’S THEFT AND CONVERSION OF VA BENEFITS

4. The VA was not timely notified of H.W.’s death and continued to mail H.W.’s benefit checks. From in or about April 1986 to sometime prior to on or about May 16,

1986, benefit checks were mailed from the U.S. Treasury Department to H.W. at 1255 N. Hollywood Street, Philadelphia, PA 19121; from on or about May 16, 1986 to sometime between on or about December 19, 1988 and on or about May 19, 1989, they were mailed to H.W. at 3000 N. Taney Street, Philadelphia, PA 19121; and from a date between on or about December 19, 1988 and on or about May 19, 1989 to in or about April 1998, benefit checks were sent by U.S. Mail to H.W. at P.O. Box 3248, Philadelphia, PA 19130. P.O. Box 3248 was opened in H.W.'s name, after her death, and the name "Doris Whitfield" was also listed on the account as a person authorized to receive mail at that P.O. Box.

5. Subsequent to H.W.'s death in April 1986, defendant DORIS WHITFIELD RICHARDSON submitted to the VA at least nine Section 306 Eligibility Verification Report forms purportedly signed by H.W. The Section 306 form must be completed by a recipient of VA benefits in order to continue to receive such benefits. The Section 306 form requires the recipient to disclose information including marital status, monthly income, net worth, and medical expenses; and must be signed by the "claimant, custodian, or guardian." The forms submitted to the VA after H.W.'s death are dated September 26, 1986; October 8, 1987; November 4, 1988; December 6, 1989; November 7, 1990; November 2, 1991; November 13, 1992; November 4, 1993; and March 13, 1996.

6. On or about April 1, 1998, defendant DORIS WHITFIELD RICHARDSON opened two bank accounts with River City Bank under the name and Social Security number of H.W., and used the address P.O. Box 3248, Philadelphia, PA 19130.

7. In or about May 1998, defendant DORIS WHITFIELD RICHARDSON contacted the VA and requested that H.W.'s VA benefit payments be electronically deposited

into a River City Bank account, and they continued to be paid into this account until in or about October 2004. During this time, payments were wired from the VA's Financial Services Center in Austin, Texas to defendant WHITFIELD RICHARDSON's account with River City Bank, which received the payments in Louisville, Kentucky, and defendant WHITFIELD RICHARDSON received these payments via cashier's check in the Eastern District of Pennsylvania.

8. In or about November 2004, defendant DORIS WHITFIELD RICHARDSON caused H.W.'s VA benefit payments to be electronically deposited into a M&T Bank account, in which her granddaughter, "S.T." was listed as a minor on the account with defendant WHITFIELD RICHARDSON listed as custodian. She continued to have these payments paid into this account until in or about June 1, 2007. During this time, payments were wired from the VA's Financial Services Center in Austin, Texas to defendant WHITFIELD RICHARDSON's account with M&T Bank, which received the payments in Amherst, New York and directed them to defendant WHITFIELD RICHARDSON's bank account in the Eastern District of Pennsylvania.

9. From in or about May 1986 through in or about June 2007, defendant DORIS WHITFIELD RICHARDSON stole and converted H.W.'s VA benefits to her personal use and benefit, and never notified the VA that H.W. had died.

10. In or about June 2007, the VA learned of H.W.'s death, and terminated her benefit payments.

11. Defendant DORIS WHITFIELD RICHARDSON improperly received and converted to her own use approximately \$33,782 in VA payments that were intended for H.W., who was deceased.

12. From in or about May 1986 and continuing through on or about June 1, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON,

knowingly stole and converted to her own use money of the United States in excess of \$1,000, that is, approximately \$33,782 in VA death pension payments that were intended for H.W., who was deceased.

In violation of Title 18, United States Code, Section 641.

COUNT THREE

(Conversion of Government Funds)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1-11 of Count One and paragraphs 1-11 of Count Two are incorporated by reference here.

2. The Social Security Administration (“SSA”), an agency of the United States, administered certain government benefit programs, including the Supplemental Security Income (“SSI”) program, pursuant to Title 42, United States Code, Sections 1381-1383f.

3. The SSI program, which was funded through general tax revenues of the United States, provided monthly cash benefits to individuals who were age sixty-five or over, or who were “disabled” and who demonstrated financial need, as determined by his or her “income” and “resources,” as those terms were defined for purposes of the Social Security Act.

4. On or about February 3, 2005, defendant DORIS WHITFIELD RICHARDSON applied for SSI benefits. She was subsequently approved, and awarded retroactive payments to March 2005.

5. During the period after her application in or about February 2005 and through in or about June 2007, defendant DORIS WHITFIELD RICHARDSON failed to disclose all of her income to SSA in that she failed to disclose that she was receiving income in the form of VA and OPM benefits intended for her grandmother, H.W.

6. This unreported income rendered defendant DORIS WHITFIELD RICHARDSON ineligible for the \$16,764 in SSI payments she received for the period of March 2005 through in or about June 2007.

7. Throughout the time period of defendant DORIS WHITFIELD RICHARDSON's application date, continuing to and through June 2007, the Social Security Administration utilized computer systems to track and communicate information regarding defendant WHITFIELD RICHARDSON's SSI application and payments.

8. Upon approval for SSI benefits, SSA transmitted, via computer system, to the U.S. Department of Treasury, benefit payment information for retroactive payments to defendant DORIS WHITFIELD RICHARDSON's approval date.

9. From in or about December 2006 through on or about June 1, 2007, defendant DORIS WHITFIELD RICHARDSON's SSI benefit payments were wired from SSA's Kansas City, Missouri payment center to the Federal Reserve Bank ACH processing site in East Rutherford, New Jersey, to the Federal Reserve Bank data center in Richmond, Virginia, and then wired to defendant WHITFIELD RICHARDSON's account at the Philadelphia Federal Credit Union in Philadelphia, Pennsylvania.

10. From in or about March 2005 and continuing through in or about June 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

knowingly stole and converted to her own use money of the United States in excess of \$1,000, that is, approximately \$16,764 in SSI benefit payments, which she was ineligible to receive.

In violation of Title 18, United States Code, Section 641.

COUNT FOUR

(Conversion of Government Funds)

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Paragraphs 1-11 of Count One and paragraphs 1-11 of Count Two are incorporated by reference here.
2. The Department of Housing and Urban Development (“HUD”), an agency of the United States, administered certain government benefit programs, including Housing Assistance Payments (“HAP”) and Utility Assistance Payments (“UAP”). In the City of Philadelphia, HUD payments were administered by the Philadelphia Housing Authority (“PHA”).
3. Through HAP, HUD paid rental subsidies so that eligible families could afford decent, safe, and sanitary housing. HAP provided a portion of an approved recipient’s rent directly to the recipient’s landlord. Through UAP, HUD administered financial payments directly to individuals living in HUD-approved homes who needed financial assistance in the payment of utilities. HAP and UAP benefits were available based on factors, including the monthly income of a household.
4. In or about February 2002, defendant DORIS WHITFIELD RICHARDSON applied for HUD benefits. She was subsequently approved, and began receiving HAP and UAP benefits in or about March 2003.
5. From the time she first submitted her application for HUD benefits in or about February 2002, through the time period of in or about March 2003 through in or about June

2007 when she actually received those HUD benefits, defendant DORIS WHITFIELD RICHARDSON concealed and failed to disclose all of her income to HUD in that she did not disclose that she was receiving income in the form of VA and OPM benefits intended for her deceased grandmother, H.W.

6. If this income had been reported as required by HUD rules and regulations, defendant DORIS WHITFIELD RICHARDSON's HAP and UAP benefits would have been offset during the period between in or about March 2003 and in or about June 2007. As a result of her fraudulent concealment of income, defendant WHITFIELD RICHARDSON received approximately \$9,054.00 in HAP payments administered to her landlord, and \$1,284 in UAP payments paid directly to defendant WHITFIELD RICHARDSON that she was not eligible to receive.

7. Throughout the time period of defendant DORIS WHITFIELD RICHARDSON's receipt of funds from in or about March 2003 through in or about June 2007, HUD utilized computer systems to track and communicate information regarding defendant WHITFIELD RICHARDSON's HUD benefits and payments.

8. From in or about March 2003 through on or about June 1, 2007, HUD benefit payments were made to defendant DORIS WHITFIELD RICHARDSON's landlord, identified herein as "J.G.," by interstate wire transfer from the bank utilized by HUD in Charlotte, North Carolina to J.G.'s M&T Bank account in the Eastern District of Pennsylvania.

9. From in or about March 2003 and continuing through on or about June 1, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

knowingly stole and converted to her own use money of the United States in excess of \$1,000, that is, approximately \$10,338 in HUD HAP and UAP benefit payments, which she was ineligible to receive.

In violation of Title 18, United States Code, Section 641.

COUNT FIVE

(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-4 of Count One of this indictment are incorporated by reference here.

THE SCHEME TO DEFRAUD

2. From on or about April 6, 1986 through on or about May 1, 2007, defendant

DORIS WHITFIELD RICHARDSON

devised and intended to devise a scheme to defraud the Office of Personnel Management (“OPM”) to obtain money from the OPM by fraudulently converting to her own use government benefits intended for her deceased grandmother.

3. It was the object of the scheme described in paragraph 2 for defendant to receive approximately \$161,757.24 in OPM benefits to which she was not entitled.

MANNER AND MEANS

4. It was part of the scheme to defraud that defendant DORIS WHITFIELD RICHARDSON engaged in the manner and means described in paragraphs 5-9 of Count One of this indictment.

5. On or about the date set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing benefit payments from the OPM to the defendant, as described below:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSACTION</u>
5	May 1, 2007	OPM payment in the amount of \$797.85 transferred by wire from San Francisco, California to Amherst, New York, to the Eastern District of Pennsylvania

In violation of Title 18, United States Code, Section 1343.

COUNTS SIX AND SEVEN

(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 of Count Two of this indictment are incorporated by reference here.

THE SCHEME TO DEFRAUD

2. From on or about April 6, 1986 through on or about June 1, 2007, defendant

DORIS WHITFIELD RICHARDSON

devised and intended to devise a scheme to defraud the Department of Veterans Affairs (“VA”) and to obtain money from the VA by fraudulently converting to her own use government benefits intended for her deceased grandmother.

3. It was the object of the scheme described in paragraph 2 for defendant DORIS WHITFIELD RICHARDSON to receive approximately \$33,782 in VA benefits to which she was not entitled.

MANNER AND MEANS

4. It was part of the scheme to defraud that defendant DORIS WHITFIELD RICHARDSON engaged in the manner and means described in paragraphs 4-9 of Count Two of this indictment.

5. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing benefit payments from the VA to the defendant, as described below, each wire transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSACTION</u>
6	May 1, 2007	VA payment in the amount of \$133.00 transferred by wire from Austin, Texas to Amherst, New York, to the Eastern District of Pennsylvania
7	June 1, 2007	VA payment in the amount of \$133.00 transferred by wire from Austin, Texas to Amherst, New York, to the Eastern District of Pennsylvania

All in violation of Title 18, United States Code, Section 1343.

COUNTS EIGHT THROUGH TEN

(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 of Count Three of this indictment are incorporated by reference here.

THE SCHEME TO DEFRAUD

2. From on or about February 3, 2005 through in or about June 2007, defendant

DORIS WHITFIELD RICHARDSON

devised and intended to devise a scheme to defraud the Social Security Administration (“SSA”) and to obtain money from the SSA by fraudulently converting to her own use government benefits she was not entitled to receive because she concealed and failed to accurately report to SSA her monthly income, in that she did not report or disclose that she was receiving OPM and VA benefits intended for her deceased grandmother.

3. It was the object of the scheme described in paragraph 2 for defendant DORIS WHITFIELD RICHARDSON to receive approximately \$16,764 in SSA benefits to which she was not entitled.

MANNER AND MEANS

4. It was part of the scheme to defraud that defendant DORIS WHITFIELD RICHARDSON engaged in the manner and means described in paragraphs 4-9 of Count Three of this indictment.

5. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing benefit payments from the SSA to the defendant, as described below, each wire transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSACTION</u>
8	May 1, 2007	SSA payment of \$623.00 by wire transfer from Kansas City, Missouri to East Rutherford, New Jersey to Richmond, Virginia to Philadelphia, Pennsylvania
9	May 2, 2007	SSA installment retroactive payment of \$1,869.00 (for the months of June-September 2006) by wire transfer from Kansas City, Missouri to East Rutherford, New Jersey to Richmond, Virginia to Philadelphia, Pennsylvania
10	June 1, 2007	SSA payment of \$623.00 by wire transfer from Kansas City, Missouri to East Rutherford, New Jersey to Richmond, Virginia to Philadelphia, Pennsylvania

All in violation of Title 18, United States Code, Section 1343.

COUNTS ELEVEN THROUGH TWELVE

(Wire Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-3 of Count Four of this indictment are incorporated by reference here.

THE SCHEME TO DEFRAUD

2. From on or about March 2003 through in or about June 2007, defendant

DORIS WHITFIELD RICHARDSON

devised and intended to devise a scheme to defraud the Department of Housing and Urban Development (“HUD”) and to obtain money from HUD by fraudulently converting to her own use government benefits she was not entitled to receive because she concealed and failed to report to HUD her entire monthly income, in that she did not report or disclose that she was receiving OPM and VA benefits intended for her deceased grandmother.

3. It was the object of the scheme described in paragraph 2 for defendant DORIS WHITFIELD RICHARDSON to receive approximately \$10,338 in HUD benefits to which she was not entitled, of which \$9,054 was payments made to her landlord on the defendant’s behalf, and \$1,284 was Utility Assistance Payments made directly to defendant WHITFIELD RICHARDSON.

MANNER AND MEANS

4. It was part of the scheme to defraud that defendant DORIS WHITFIELD RICHARDSON engaged in the manner and means described in paragraphs 4-8 of Count Four of this indictment.

5. On or about the dates set forth below, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON

for the purpose of executing the scheme described above, and attempting to do so, and aiding and abetting its execution, knowingly caused to be transmitted in interstate commerce, by means of wire communication, certain signs, signals and sounds, namely, a wire transfer of funds representing benefit payments from HUD, as described below, each wire transmission constituting a separate count:

<u>COUNT</u>	<u>DATE</u>	<u>DESCRIPTION OF WIRE TRANSACTION</u>
11	April 26, 2007	Payment to landlord J.G. of \$591.00 by wire transfer from Charlotte, North Carolina to the Eastern District of Pennsylvania
12	May 24, 2007	Payment to landlord J.G. of \$591.00 by wire transfer from Charlotte, North Carolina to the Eastern District of Pennsylvania

All in violation of Title 18, United States Code, Section 1343.

COUNT THIRTEEN

(Social Security Fraud)

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1-9 of Count Three of this indictment are incorporated by reference here.

2. From in or about March 2005 and continuing through in or about June 1, 2007, in the Eastern District of Pennsylvania and elsewhere, defendant

DORIS WHITFIELD RICHARDSON,

in a matter within the jurisdiction of the Social Security Administration (“SSA”), willfully, knowingly, and with the intent to deceive, concealed and failed to disclose an event affecting her initial and continued right to SSA benefit payments, in that she concealed and failed to disclose all of her income to the SSA, as she was required to do in order to receive SSA benefit payments.

In violation of Title 42, United States Code, Section 1383a(a)(3)(A).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Sections 641 (Conversion of Government Funds) and 1343 (Wire Fraud), set forth in this indictment, defendant

DORIS WHITFIELD RICHARDSON

shall forfeit to the United States of America any property, real or personal, that constitutes or is derived from proceeds traceable to the commission of such offenses, including, but not limited to, the sum of \$222,641.24.

2. 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 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 28, United States Code, Section 2461(c), 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 28, United States Code, Section 2461(c) and Title 18, United States Code, Section 981(a)(1)(C).

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY