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U.S. DISTRICT COURT  
EAST DISTRICT OF LA

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**BILL OF INFORMATION  
FOR HARBORING ALIENS**

UNITED STATES OF AMERICA

\*

CRIMINAL NO.

**15-156**

v.

\*

SECTION:

**SECT. A MAG. 2**

M.D. BASCIANI AND SONS, INC.

\*

VIOLATION: 8 U.S.C. § 1324(a)(1)(A)(iii)

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The United States Attorney charges that:

**COUNT 1**

Beginning not later than on or about July 1, 2013, and continuing until on or about October 15, 2014, in the Eastern District of Louisiana and elsewhere, the defendant, **M.D. BASCIANI AND SONS, INC.**, knowing and in reckless disregard of the fact that aliens, namely, several of its employees at the Red Hill Mushroom Farm in Independence, Louisiana, had come to, entered and remained in the United States in violation of law, did conceal, harbor, and shield from detection and attempt to conceal, harbor, and shield from detection such aliens for the purpose of commercial advantage and private financial gain, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(iii).

### NOTICE OF FORFEITURE

1. The allegations of Count 1 of this Bill of Information are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States pursuant to the provisions of Title 18, United States Code, Section 982(a)(6).

2. As a result of the offense alleged in Count 1, defendant, **M.D. BASCIANI AND SONS, INC.**, shall forfeit to the United States, all conveyances used in the commission of the violation, all property, real and/or personal, that constitutes or is derived from or is traceable to proceeds obtained directly or indirectly from the commission of the offenses, and all property, real or personal, that was used to facilitate, or was intended to be used to facilitate the commission of the offenses, including but not limited to:

- a. At least \$1,053,028.10 in United States Currency and all interest and proceeds traceable thereto.

The government specifically provides notice of its intent to seek a personal money judgment against the defendant in the amount of the fraudulently-obtained proceeds.

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 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, pursuant to Title 18, United States Code, Section 982(b)(1) to seek forfeiture of any other property of said defendant.

All in violation of Title 18, United States Code, Section 982(a)(6).

KENNETH ALLEN POLITE, JR.  
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read 'D. J. Haller', written over a horizontal line.

DAVID HALLER  
Assistant United States Attorney

New Orleans, Louisiana  
June 15, 2015