

OCT 26 2017

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF VIRGINIA  
ROANOKE DIVISION  
OCTOBER 2017 SESSION

JULIA C. DUDLEY, CLERK  
BY: *[Signature]*  
DEPUTY CLERK

UNITED STATES OF AMERICA	:	SEALED
	:	
v.	:	Criminal Number <u>7:17cr065</u>
	:	
LINDA JANE HALL	:	Violations of
	:	18 U.S.C. §1343
	:	18 U.S.C. §1956(a)(1)(B)(i)

INTRODUCTION

The Grand Jury charges at all times material to this Indictment:

1. LINDA JANE HALL resided in the Roanoke area of the Western District of Virginia.
2. RSH is the son of LINDA JANE HALL and resided in the Roanoke area of the Western District of Virginia.
3. TAL is the sister of LINDA JANE HALL and resided in the Roanoke area of the Western District of Virginia.
4. LINDA JANE HALL, RSH, and TAL all maintained bank accounts at Freedom First Federal Credit Union.
5. MoneyGram is a wire transfer company based in the United States that provides a process for persons to transfer money to other persons or companies. These transfers of money are sent by wire transfers and can be sent interstate. Wal-Mart is a vendor for MoneyGram.

6. RWW resided in Mississippi. Sometime prior to August 2009, RWW began engaging in telephone conversations with **LINDA JANE HALL**. Although RWW never met **LINDA JANE HALL** in person, from February 25, 2011, to November 6, 2012, RWW sent **LINDA JANE HALL** \$232,200 using wire transfers to the accounts of RSH and TAL at Freedom First Federal Credit Union. RWW also introduced **LINDA JANE HALL** to JCB, CRT, and JBS, persons who also sent money to **LINDA JANE HALL**.

7. JCB resided in Alabama. On or prior to August 13, 2009, JCB was introduced to **LINDA JANE HALL** by RWW, and JCB began engaging in telephone conversations with **LINDA JANE HALL**. From August 13, 2009, to April 10, 2014, JCB sent **LINDA JANE HALL** \$116,700 using checks, wire transfers, and MoneyGram wire transfers. Of those funds, JCB sent **LINDA JANE HALL** 150 MoneyGram wire transfers totaling \$92,200. JCB met **LINDA JANE HALL** in person, in the Roanoke area, on approximately three occasions during this time period.

8. CRT resided in Mississippi. On or prior to October 29, 2009, CRT was introduced to **LINDA JANE HALL** by RWW, and CRT began engaging in telephone conversations with **LINDA JANE HALL**. From October 29, 2009, to May 8, 2015, CRT sent **LINDA JANE HALL** \$66,760 using checks and MoneyGram wire transfers. Of those funds, CRT sent **LINDA JANE HALL** 235 MoneyGram wire transfers totaling \$65,800. CRT never met **LINDA JANE HALL** in person.

9. JBS resided in Texas. On or prior to December 6, 2011, JBS was introduced to **LINDA JANE HALL** by RWW, and JBS began engaging in telephone

conversations with **LINDA JANE HALL**. From December 6, 2011, to March 28, 2013, JBS sent **LINDA JANE HALL** \$41,800 using wire transfers and MoneyGram wire transfers. Of those funds, JBS sent **LINDA JANE HALL** two MoneyGram wire transfers totaling \$800. JBS never met **LINDA JANE HALL** in person.

**Means, Methods and Purpose of the Scheme and Artifice to Defraud**

10. Beginning on a date prior to August 13, 2009, and continuing through at least May 8, 2015, **LINDA JANE HALL**, devised and intended to devise a scheme and artifice to defraud and to obtain money from JCB, CRT, RWW, and JBS by means of false pretenses, representations, and promises.

11. It was the principal object of the scheme and artifice that the defendant, **LINDA JANE HALL**, would tell JCB, CRT, RWW, and JBS materially misleading and false information to induce them to provide money to her.

12. It was further part of the scheme and artifice to defraud that **LINDA JANE HALL** misrepresented and omitted material facts and engaged in acts and practices that were fraudulent and deceitful.

**The Scheme and Artifice to Defraud**

13. Beginning on a date prior to August 13, 2009, and continuing through at least April 10, 2014, **LINDA JANE HALL** engaged in the practice of deceiving JCB by leading him to believe that he was investing in an oil venture. In fact, those representations by **LINDA JANE HALL** were untrue.

14. As a result of **LINDA JANE HALL**'s material misrepresentations to JCB, JCB provided money to **LINDA JANE HALL** during each of the years beginning in 2009 and continuing to 2014, as follows:

<b>Year</b>	<b>Money from JCB to Hall</b>
2009	\$ 33,100.00
2010	\$ 26,000.00
2011	\$ 6,325.00
2012	\$ 20,475.00
2013	\$ 25,500.00
2014	\$ 5,300.00
<b>Total</b>	<b>\$116,700.00</b>

15. From on or about August 14, 2009, through at least April 11, 2014, **LINDA JANE HALL** obtained \$92,200 from 150 MoneyGram transfers initiated by JCB at Wal-Mart stores located in Alabama, Georgia, West Virginia, and Kentucky and obtained \$24,500 from additional monies JCB sent using checks and wire transfers.

16. **LINDA JANE HALL** used a portion of the funds fraudulently obtained from JCB as follows:

- a. On or about November 20, 2009, **LINDA JANE HALL** paid \$3,800 to remove and replace the roof at the residence of RSH;
- b. On or about November 20, 2009, **LINDA JANE HALL** paid the Internal Revenue Service \$3,000 for taxes she owed;
- c. On or about February 22, 2012, **LINDA JANE HALL** paid \$1,800 as a down payment for improvements at her husband's residence; and
- d. On or about March 12, 2012, **LINDA JANE HALL** made an additional payment for the improvements at her husband's residence.

17. Beginning on a date prior to October 29, 2009, and continuing through at least May 8, 2015, **LINDA JANE HALL** engaged in the practice of deceiving CRT by leading him to believe that he was assisting **LINDA JANE HALL** in paying the Internal Revenue Service for taxes **LINDA JANE HALL** owed as a result of a bad business deal or a failed partnership. In fact, **LINDA JANE HALL** did not owe taxes as a result of a bad business deal or a failed partnership.

18. As a result of **LINDA JANE HALL**'s material misrepresentations to CRT, CRT provided money to **LINDA JANE HALL** during each of the years beginning in 2009 and continuing to 2015, as follows:

<b>Year</b>	<b>Money from CRT to HALL</b>
2009	\$ 960.00
2010	\$ 9,230.00
2011	\$ 29,740.00
2012	\$ 13,809.00
2013	\$ 7,181.00
2014	\$ 4,270.00
2015	\$ 1,570.00
<b>Total</b>	<b>\$ 66,760.00</b>

19. From on or about October 29, 2009, through at least May 9, 2015, **LINDA JANE HALL** obtained \$65,800 from 235 MoneyGram transfers initiated by CRT at Wal-Mart stores located in Mississippi and **LINDA JANE HALL** obtained \$960 in additional monies CRT sent by check.

20. Beginning on a date prior to August 2009, and continuing through at least November 6, 2012, **LINDA JANE HALL** engaged in the practice of deceiving RWW by leading him to believe that he was assisting **LINDA JANE HALL** in paying the Internal

Revenue Service for taxes owed by the Estate of JCG, the mother of **LINDA JANE HALL**. In fact, JCG did not have an Estate that owed funds to the IRS.

21. As a result of **LINDA JANE HALL**'s material misrepresentations to RWW, RWW provided \$232,200 to **LINDA JANE HALL** during the years 2011 and 2012. The monies were deposited to the personal bank accounts of RSH and TAL, the son and sister of **LINDA JANE HALL**. A portion of the monies provided by RWW to **LINDA JANE HALL** in 2011 and 2012 was received using the bank account of RSH as follows:

- a. On or about February 25, 2011, at the direction of **LINDA JANE HALL**, RWW wire transferred \$38,000 into the bank account of RSH; and
- b. On or about May 18, 2011, at the direction of **LINDA JANE HALL**, RWW wire transferred \$90,000 into the bank account of RSH.

22. From on or about February 28, 2011, through at least August 27, 2012, RSH did the following with the \$128,000 received in his account from RWW:

- a. On February 28, 2011, RSH withdrew \$7,500 in cash. Through multiple transactions, RSH withdrew at least \$50,000 in cash;
- b. On or about February 28, 2011, RSH paid his father, REH, \$5,000;
- c. On or about February 28, 2011, RSH paid \$3,000 as a down payment for a 2011 Buick Enclave purchased in the name of TAL;
- d. On or about May 18, 2011, RSH, transferred \$15,000 into the bank account of TAL;

- e. On or about May 18, 2011, RSH paid his father, REH, \$5,000;
- f. On or about May 18, 2011, RSH paid the Commonwealth of Virginia \$4,850 for Virginia income taxes owed by **LINDA JANE HALL**;
- g. On or about June 10, 2011, RSH paid \$20,000 for a 2009 Jeep Wrangler purchased in the name of **LINDA JANE HALL**;
- h. On or about June 20, 2011, RSH paid his father, REH, \$9,000;
- i. On or about November 29, 2011, RSH paid a contractor \$3,700 for improvements at his residence; and
- j. On or about January 4, 2012, RSH paid the same contractor another \$2,000 for improvements at his residence.

23. A portion of the money provided by RWW to **LINDA JANE HALL** in 2011 and 2012 was received using the bank account of TAL as follows:

- a. On or about September 20, 2011, RWW, at the direction of **LINDA JANE HALL**, wire transferred \$59,000 into the bank account of TAL;
- b. On or about October 15, 2012, RWW, at the direction of **LINDA JANE HALL**, wire transferred \$2,200 into the bank account of TAL;
- c. On or about October 31, 2012, RWW, at the direction of **LINDA JANE HALL**, wire transferred \$40,000 into the bank account of TAL; and
- d. On or about November 6, 2012, RWW, at the direction of **LINDA JANE HALL**, wire transferred \$3,000 into the bank account of TAL.

24. From on or about September 20, 2011, through at least November 21, 2012, TAL did the following with the \$104,200 received from RWW:

- a. On September 20, 2011, TAL withdrew \$1,000 in cash. Through multiple transactions, TAL withdrew at least \$23,000 in cash;
- b. On or about September 20, 2011, TAL paid a contractor \$8,227 as a down payment on garage construction at the residence of TAL and MGL;
- c. On or about November 14, 2011, TAL paid the contractor \$23,310.50 as an additional payment toward the construction of a garage at her residence;
- d. On or about November 1, 2012, TAL paid the contractor \$20,000 as final payment toward the garage under construction at her residence; and
- e. On or about November 2, 2012, TAL transferred \$10,000 to the bank account of **LINDA JANE HALL**.

25. Beginning on a date prior to December 6, 2011, and continuing through at least March 28, 2013, **LINDA JANE HALL**, engaged in the practice of deceiving JBS into sending her money by leading him to believe that she was destitute and living in a storage unit. **LINDA JANE HALL** promised JBS repayment of the funds by providing JBS seven "Sale and Assignment" documents purporting to give him a portion of the proceeds of a multi-billion dollar oil venture lawsuit. In fact, **LINDA JANE HALL** was not destitute and living in a storage unit. In 2011, **LINDA JANE HALL** was employed at a local company earning in excess of \$60,000. In 2012, **LINDA JANE HALL**



received in excess of \$50,000 through a combination of earnings and retirement payments.

26. As a result of **LINDA JANE HALL**'s material misrepresentations to JBS, JBS provided money by wire transfers to **LINDA JANE HALL** during each of the years beginning in 2011 and continuing to 2013, as follows:

<b>Year</b>	<b>Money from JBS to HALL</b>
2011	\$ 16,500.00
2012	\$ 18,500.00
2013	\$ 6,800.00
<b>Total</b>	<b>\$ 41,800.00</b>

27. From on or about December 6, 2011, through at least April 12, 2013, **LINDA JANE HALL** did the following with the monies obtained from JBS:

- a. On December 7, 2011, **LINDA JANE HALL** withdrew \$2,500 cash. Through multiple transactions, **LINDA JANE HALL** withdrew at least \$30,000 in cash;
- b. **LINDA JANE HALL** obtained \$800 in cash from two MoneyGram wire transfers initiated by JBS at Wal-Mart stores located in Texas;
- c. On or about December 12, 2011, **LINDA JANE HALL**, paid the Internal Revenue Service \$2,108.61 for taxes **LINDA JANE HALL** owed;
- d. On or about September 11, 2012, **LINDA JANE HALL**, paid her husband, REH, \$1,600; and
- e. On or about September 28, 2012, **LINDA JANE HALL**, paid \$5,000 as a payment toward the garage being built at the residence of TAL and MGL.

28. **LINDA JANE HALL** fraudulently obtained \$457,460 from RWW, JCB, CRT, and JBS through materially false and fraudulent representations. The funds were not used for the purposes represented to obtain the funds, nor did those purposes exist.

**COUNT ONE**  
(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.

2. On or about October 31, 2012, in the Western District of Virginia, and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$40,000 from RWW's account at BancorpSouth in Mississippi to TAL, **LINDA JANE HALL's** sister's account, at Freedom First Federal Credit Union in Roanoke, Virginia.

3. All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT TWO**

(Money Laundering – 18 U.S.C. §1956(a)(1)(B)(i))

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about November 2, 2012, in the Western District of Virginia and elsewhere, **LINDA JANE HALL**, as a principal and as an aider and abettor, did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the transfer of \$10,000 from TAL's account at Freedom First Federal Credit Union to **LINDA JANE HALL**'s account at Freedom First Federal Credit Union, which involved the proceeds of a specified unlawful activity, that is, a scheme and artifice to defraud using an interstate wire transfer as described in the Introduction and Count One of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, **LINDA JANE HALL** knew that the property involved in the financial transaction, that is, funds in the amount of \$10,000, represented the proceeds of some form of unlawful activity.
3. All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT THREE**

(Money Laundering – 18 U.S.C. §1956(a)(1)(B)(i))

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about November 2, 2012, in the Western District of Virginia and elsewhere, **LINDA JANE HALL**, as a principal and as an aider and abettor, did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the withdrawal of \$5,000 in cash from **LINDA JANE HALL's** account at Freedom First Federal Credit Union, which involved the proceeds of a specified unlawful activity, that is, a scheme and artifice to defraud using an interstate wire transfer as described in the Introduction and Count One of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, **LINDA JANE HALL** knew that the property involved in the financial transaction, that is, funds in the amount of \$5,000, represented the proceeds of some form of unlawful activity.
3. All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT FOUR**

(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about November 6, 2012, in the Western District of Virginia, and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses, representations, and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$3,000 from RWW's account at BancorpSouth in Mississippi to TAL, **LINDA JANE HALL's** sister's account, at Freedom First Federal Credit Union in Roanoke, Virginia.
3. All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT FIVE**

(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about January 25, 2013, in the Western District of Virginia, and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of

materially false and fraudulent pretenses, representations and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$300.00 from JBS through MoneyGram in Texas to **LINDA JANE HALL** in Salem, Virginia.

3. All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT SIX**  
(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.

2. On or about March 28, 2013, in the Western District of Virginia, and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of false and fraudulent pretenses, representations, and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$6,500 from JBS's account at The Bankers Bank in Texas to **LINDA JANE HALL's** account, at Freedom First Federal Credit Union in Roanoke, Virginia.

3. All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT SEVEN**

(Money Laundering – 18 U.S.C. §1956(a)(1)(B)(i))

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about March 29, 2013, in the Western District of Virginia and elsewhere, **LINDA JANE HALL**, as a principal and as an aider and abettor, did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the withdrawal of \$2,000 in cash from **LINDA JANE HALL's** account at Freedom First Federal Credit Union, which involved the proceeds of a specified unlawful activity, that is, a scheme and artifice to defraud using an interstate wire transfer as described in the Introduction and Count Six of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, **LINDA JANE HALL** knew that the property involved in the financial transaction, that is, funds in the amount of \$2,000, represented the proceeds of some form of unlawful activity.
3. All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT EIGHT**

(Money Laundering – 18 U.S.C. §1956(a)(1)(B)(i))

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about March 29, 2013, in the Western District of Virginia and elsewhere, **LINDA JANE HALL**, as a principal and as an aider and abettor, did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the withdrawal of \$1,500 in cash from **LINDA JANE HALL's** account at Freedom First Federal Credit Union, which involved the proceeds of a specified unlawful activity, that is, a scheme and artifice to defraud using an interstate wire transfer as described in the Introduction and Count Six of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, **LINDA JANE HALL** knew that the property involved in the financial transaction, that is, funds in the amount of \$1,500, represented the proceeds of some form of unlawful activity.
3. All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.



**COUNT NINE**

(Money Laundering – 18 U.S.C. §1956(a)(1)(B)(i))

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about March 30, 2013, in the Western District of Virginia and elsewhere, **LINDA JANE HALL**, as a principal and as an aider and abettor, did knowingly conduct, and attempt to conduct, a financial transaction affecting interstate commerce, to wit, the withdrawal of \$1,000 in cash from **LINDA JANE HALL's** account at Freedom First Federal Credit Union, which involved the proceeds of a specified unlawful activity, that is, a scheme and artifice to defraud using an interstate wire transfer as described in the Introduction and Count Six of this Indictment, knowing that the transaction was designed in whole and in part to conceal and disguise, the source, ownership, and control of the proceeds of the specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, **LINDA JANE HALL** knew that the property involved in the financial transaction, that is, funds in the amount of \$1,000, represented the proceeds of some form of unlawful activity.
3. All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

**COUNT TEN**

(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about April 10, 2014, in the Western District of Virginia; and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of materially false and fraudulent pretenses, representations and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$700.00 from JCB through MoneyGram in Alabama to **LINDA JANE HALL** in Salem, Virginia.
3. All in violation of Title 18, United States Code, Sections 1343 and 2.

**COUNT ELEVEN**

(Wire Fraud – 18 U.S.C. §1343)

The Grand Jury charges:

1. The Introduction to the Indictment is incorporated by reference into this Count of the Indictment as if fully set forth herein.
2. On or about May 8, 2015, in the Western District of Virginia, and elsewhere, **LINDA JANE HALL**, for the purpose of executing, and attempting to execute, the scheme and artifice to defraud and for obtaining money by means of

materially false and fraudulent pretenses, representations and promises, did cause to be transmitted by means of a wire communication in interstate commerce, certain signs, signals, and sounds, that is, the receipt of an interstate wire transfer of \$80.00 from CRT through MoneyGram in Mississippi to **LINDA JANE HALL** in Roanoke, Virginia.

3. All in violation of Title 18, United States Code, Sections 1343 and 2.

### NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, **LINDA JANE HALL** shall forfeit to the United States:

- a. any property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Section 1343, pursuant to Title 18 United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).
- b. any property, real or personal, involved in said offenses, or any property traceable to such property, pursuant to Title 18, United States Code, Section 982(a)(1).

2. The property to be forfeited to the United States includes but is not limited to the following property:

- a. Money Judgment

Not less than \$457,460.00 in United States currency and all interest and proceeds traceable thereto, in that such sum in aggregate was obtained directly or indirectly as a result of said offenses or is traceable to such property.

3. If any of the above-described forfeitable property, as a result of any act or omission of **LINDA JANE HALL**:

- 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 21, United States Code Section 853(p), as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

A TRUE BILL this 26 day of October, 2017.

  
\_\_\_\_\_  
RICK A. MOUNTCASTLE  
ACTING UNITED STATES ATTORNEY

s/Grand Jury Foreperson  
FOREPERSON