

FILED  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF LA.  
2019 MAY -2 P 1:57  
WILLIAM W. BLEVINS  
CLERK

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**FELONY**

**INDICTMENT FOR CONSPIRACY TO COMMIT BANK  
FRAUD AND WIRE FRAUD, BANK FRAUD, WIRE FRAUD,  
AGGRAVATED IDENTITY THEFT, AND NOTICE OF FORFEITURE**

UNITED STATES OF AMERICA

v.

CHRISTOPHER WATSON

\* CRIMINAL NO. **19-00079**

\* SECTION: **SECT. L MAG. 3**

\* VIOLATIONS: 18 U.S.C. § 371  
18 U.S.C. § 1343  
18 U.S.C. § 1344  
18 U.S.C. § 1028A

\* \* \*

The Grand Jury charges that:

**COUNT 1**

**(Conspiracy to Commit Bank Fraud and Wire Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. Beginning at an unknown time and continuing to on or about July 30, 2018, the defendant, **CHRISTOPHER WATSON**, was a resident of Harvey, Louisiana.

2. A Better Car Company was a used car dealership located at 2424 Lapalco Blvd. in Harvey, Louisiana and licensed through the Louisiana Motor Vehicle Commission. Anba Beyro Enterprise, LLC owned and operated A Better Car Company. A.M. was the sole owner and operator

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of Anba Beyro Enterprises, LLC, d/b/a A Better Car Company. **WATSON** was employed as a car salesman at A Better Car Company from on or about June 2017 to on or about January 11, 2018.

3. Lapalco Motors, LLC was a used car dealership located at 5424 Lapalco Blvd., Marrero, Louisiana and licensed through the Louisiana Motor Vehicle Commission.

4. Import Star, LLC was a car dealership located at 11042 Cedar Park Avenue in Baton Rouge, Louisiana and licensed through the Louisiana Motor Vehicle Commission.

5. USAA Financial ("USAA") was a financial banking institution whose deposits were insured by the Federal Deposit Insurance Corporation ("FDIC"). USAA was headquartered in San Antonio, Texas. USAA offered membership to individuals and their families who are currently serving or formerly served in the U.S. military. USAA received all of their automobile loan applications in San Antonio, Texas and processed loan payments from there as well.

6. Westlake Financial Services, LLC, of California, d/b/a Westlake Financial Services ("Westlake"), was a privately-held finance company licensed in the state of California and authorized to conduct business in Louisiana.

7. United Auto Credit ("United Auto") was an automotive lender based in California and serving markets nationwide.

8. Pentagon Federal Credit Union ("PenFed") was a federal credit union headquartered in McLean, Virginia and regulated under the authority of the National Credit Union Administration.

9. Jefferson Financial Federal Credit Union ("Jefferson Financial FCU") was a federal credit union with branch locations in Louisiana and Alabama. **WATSON** maintained personal and business checking accounts with Jefferson Financial FCU. Jefferson Financial FCU accessed Automated Clearing House ("ACH") deposits to their accounts through a secure fund transfer

service within the Federal Reserve System called FedLine Advantage. Jefferson Financial FCU accessed FedLine Advantage via the Louisiana Corporate Credit Union, located in Metairie, Louisiana. Louisiana Corporate Credit Union processed ACH transfers through the Federal Reserve System's FedLine Command service. Jefferson Financial FCU's core computer server for processing deposit and withdrawal transactions was located in Kenner, Louisiana.

10. Chase Bank was a U.S. consumer banking business of JP Morgan Chase & Co., a global financial services firm with operations worldwide. **WATSON** maintained a business checking account with Chase Bank.

11. Whitney Bank was a financial institution headquartered in Gulfport, Mississippi. In May 2018, the company changed its name to Hancock Whitney Bank. **WATSON** maintained a business account in the name of "The Fat Kid Nola Inc." and used his alias of Alex Patel on this account.

12. "Corporate Funders Inc.," 2245 Manhattan Blvd., Ste. 205, Harvey, Louisiana, was a fictitious business entity registered with the Louisiana Secretary of State on or about January 17, 2017. **WATSON** was the sole registered agent and officer of Corporate Funders Inc. **WATSON's** business account with Jefferson Financial FCU was in the name of Corporate Funders Inc.

13. "The Fat Kid NOLA Inc.," 1801 Manhattan Blvd., Suite DOA, Harvey, Louisiana, was a fictitious business entity registered with the Louisiana Secretary of State on March 29, 2017. Travis Nathan and "Alex Patel," an alias for **WATSON**, were the registered agents and officers.

**B. THE CONSPIRACY:**

Beginning at a time unknown, and continuing until on or about July 30, 2018, in the Eastern District of Louisiana and elsewhere, **WATSON**, and others known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree with each other:

- a. to execute or attempt to execute a scheme or artifice to defraud financial institutions, the funds of which were then federally insured, in order to secure automobile financing by means of false and fraudulent pretenses, representations, or promises, in violation of Title 18, United States Code, Section 1344; and,
- b. to devise a scheme to defraud and to obtain money and property from various victims by making false material representations regarding automobile financing, and in furtherance of this scheme to defraud, did make or cause to be made, interstate wirings, in violation of Title 18, United States Code, Section 1343.

**C. THE SCHEME TO DEFRAUD:**

It was part of the scheme and artifice to defraud that beginning at an unknown time, but prior to on or about January 2017, **WATSON** devised a scheme to fraudulently obtain vehicle financing from financial institutions and lenders for vehicle purchases based on fraudulent or stolen identities.

It was further part of the scheme and artifice to defraud that **WATSON** enlisted the assistance of other coconspirators known or unknown to the grand jury to fraudulently obtain the personal identifiers of the individuals whose identities he was stealing, in some cases current or former military members or their families.

It was further part of the scheme and artifice to defraud that **WATSON**, with the assistance of other coconspirators known or unknown to the grand jury, made false representations to automotive lenders, financial institutions, and the Jefferson Parish government, among other entities, in order to further the scheme to defraud.

It was further part of the scheme and artifice to defraud that **WATSON**, while employed at A Better Car Company, stole personal identifying information from his customers and later used those customers' information in order to secure automobile loans in their names.

It was further part of the scheme and artifice to defraud that **WATSON** submitted fraudulent documentation to automotive lenders in order to redirect automobile loans intended for A Better Car Company to his bank accounts instead.

It was further part of the scheme and artifice to defraud that **WATSON** utilized the dealer license numbers and names of different legitimate car dealerships and forged their names as sellers on the fraudulent loan applications.

It was further part of the scheme and artifice to defraud that **WATSON** utilized various business accounts to receive the fraudulently-obtained automobile loans, and frequently changed accounts in order to evade detection.

It was further part of the scheme and artifice to defraud that **WATSON** enlisted the assistance of other coconspirators known or unknown to the grand jury to obtain numerous state identification cards with the names and information of other individuals, both real and fictitious.

It was part of the scheme and artifice to defraud that throughout the conspiracy **WATSON** utilized several different aliases, including but not limited to, Alex Patel, Christopher Sada, Cody Watson, Cody Sada, and Mohammed Khali, among others.

**D. OVERT ACTS IN FURTHERANCE OF THE CONSPIRACY:**

1. On or about January 10, 2017, **WATSON** created the fictitious business of Corporate Funders LLC with an address of 2245 Manhattan Blvd., Suite 205, Harvey, Louisiana, 70058.

2. On or about March 29, 2017, **WATSON** created the fictitious business of The Fat Kid Nola with an address of 1801 Manhattan Blvd., Harvey, Louisiana.

3. On or about December 5, 2017, **WATSON** opened business checking account no. \*\*\*\*\*28 under his alias of Alex Patel for The Fat Kid Nola Inc. at 1801 Manhattan Blvd., Suite DOA, Harvey, Louisiana, at a Whitney Bank branch located at 3311 Canal Street, New Orleans, Louisiana. Alex Patel was listed as the sole authorized user of the account.

4. On or about December 6, 2017, **WATSON** forged the signature of A.M., the legitimate owner of A Better Car Company, and fraudulently utilized the dealership's federal tax name, Anba Beyro Enterprises, LLC, and tax identification number, and submitted a false authorization form to Westlake, changing the account information for ACH deposits for A Better Car Company to a Whitney bank account for The Fat Kid Nola.

5. On or about December 6, 2017, **WATSON** forged the signature of A.M., the legitimate owner of A Better Car Company, utilized the dealership's federal tax name, Anba Beyro Enterprises, LLC, and tax identification number, and submitted a false authorization form to United Auto, changing the account information for ACH deposits for A Better Car Company to a Whitney bank account for The Fat Kid Nola.

6. On or about December 8, 2017, **WATSON** submitted to Westlake a fraudulent Retail Installment Contract between C.A. and A Better Car Company, along with accompanying documentation, for financing of a 2015 Toyota Corolla, VIN 5YFBURHE9FP226716, a vehicle that had previously been sold to another customer of A Better Car Company.

7. On or about December 11, 2017, **WATSON** opened bank account no. \*\*\*\*\*96 under the alias of Alex Patel for The Fat Kid Nola d/b/a A Better Car Company at 3049 Alex

Korman Blvd., Harvey, Louisiana, at a JP Morgan Chase Bank branch located at 2340 Manhattan Blvd., Harvey, Louisiana. Alex Patel was listed as the sole authorized user of the account.

8. On or about December 11, 2017, **WATSON**, under the alias of Alex Patel, obtained a trade name affidavit stating that under the name The Fat Kid Nola Inc he will conduct business as A Better Car Company at 2424 Lapalco Blvd., Harvey, Louisiana.

9. On or about December 11, 2017, **WATSON**, under the alias of Alex Patel, filed a false affidavit with the Clerk of Court in Jefferson Parish, Louisiana for recordation in which he falsely represented that The Fat Kid Nola Inc. will conduct business as A Better Car Company.

10. On or about December 11, 2017, **WATSON** forged the signature of A.M., the legitimate owner of A Better Car Company, utilized the dealership's federal tax name, Anba Beyro Enterprises, LLC, and tax identification number, and submitted a false authorization form to Westlake, changing the account information for the ACH deposits for A Better Car Company to a Chase bank account for The Fat Kid Nola.

11. On or about December 11, 2017, **WATSON** sent a text message to a coconspirator and requested a fraudulent driver's license in the name of A.M., the legitimate owner of A Better Car Company. **WATSON** requested that, with the exception of the name and signature, the license should bear the same information as his Alex Patel license.

12. On or about December 12, 2017, **WATSON** fraudulently obtained a deposit of approximately \$9,774.02 from Westlake into the Whitney bank account for The Fat Kid Nola for the purchase of a 2015 Toyota Corolla, VIN 5YFBURHE9FP226716, by C.A. from A Better Car Company.

13. On or about December 13, 2017, **WATSON** opened a credit card with a credit limit of \$10,000 in the name of A.M. at PenFed Credit Union and charged a total of approximately \$2,328.12 between on or about December 13-15, 2017 without A.M.'s knowledge or consent.

14. On or about December 18, 2017, **WATSON** forged the signature of A.M., the legitimate owner of A Better Car Company, and fraudulently utilized the dealership's federal tax name, Anba Beyro Enterprises, LLC, and tax identification number, and submitted a false authorization form to United Auto, changing the account information for ACH deposits for A Better Car Company to a Chase bank account for The Fat Kid Nola.

15. On or about December 19, 2017, **WATSON** submitted an online application to open bank account no. \*\*\*\*\*93 under his own name at Jefferson Financial FCU. **WATSON** utilized his own identifiers to open this account and was the sole authorized user of the account.

16. On or about December 19, 2017, **WATSON** also opened bank account no. \*\*\*\*\*68 in the name of Corporate Funders Inc. at a Jefferson Financial FCU located at 5036 Lapalco Blvd., Marrero, Louisiana. The sole authorized user for this account was **WATSON**.

17. On or about December 21, 2017, **WATSON** fraudulently obtained a deposit of approximately \$5,414.18 from United Auto into the Chase bank account for The Fat Kid Nola d/b/a Better Car Company for the purchase of a 2012 Volkswagen Jetta, VIN 3VW2K7AJ9CM384975, by C.A. from A Better Car Company based on a Retail Installment Contract between C.A. and A Better Car Company, dated on or about November 16, 2017.

18. On or about December 22, 2017, **WATSON** fraudulently obtained a deposit of approximately \$4,140.07 from United Auto into the Chase bank account for The Fat Kid Nola d/b/a A Better Car Company for the purchase of a 2009 GMC Acadia, VIN



1GKER13D19J108008, by K.L. from A Better Car Company based on a Retail Installment Contract between K.L. and A Better Car Company, dated on or about November 16, 2017.

19. On or about December 26, 2017, **WATSON** submitted to Westlake a Retail Installment Contract between K.J. and A Better Car Company, along with fraudulent accompanying documentation, for financing of a 2014 Cadillac ATS, VIN 1G6AC5SX6E0143757.

20. On or about December 28, 2017, **WATSON** submitted to Westlake a fraudulent Retail Installment Contract between K.R. and A Better Car Company, along with accompanying documentation, for financing of a 2016 Toyota Camry, VIN 4T1BD1FK2GU177076.

21. On or about December 29, 2017, **WATSON** fraudulently obtained a deposit of approximately \$18,191.20 from Westlake into the Chase bank account for The Fat Kid Nola d/b/a A Better Car Company for the purchase of a 2014 Cadillac ATS, VIN 1G6AC5SX6E0143757, by K.J. from A Better Car Company.

22. On or about January 4, 2018, **WATSON** fraudulently obtained a deposit of approximately \$15,491.52 from Westlake into the Chase bank account for The Fat Kid Nola d/b/a A Better Car Company for the purchase of the 2016 Toyota Camry, VIN 4T1BD1FK2GU177076, by K.R., from A Better Car Company.

23. On or about January 8, 2018, **WATSON** fraudulently obtained a deposit of approximately \$6,781.15 from United Auto into the Chase bank account for The Fat Kid Nola d/b/a A Better Car Company for the purchase of a 2011 Dodge Charger-V6, VIN 2B3CL3CG2BH555871, by T.L. from A Better Car Company based on a Retail Installment Contract between T.L. and A Better Car Company, dated on or about December 26, 2017.

24. On or about January 10, 2018, **WATSON** utilized the “DealerCenter” software to forge a USAA Financial Dealer Funding Request Form using the personal identifiers of M.C. in order to secure an automobile loan in the amount of approximately \$48,679.01 for the fraudulent purchase of a 2017 Lexus SUV, VIN-JTJBARBZ9H2122665, from A Better Car Company, located at 2424 Lapalco Blvd. in Harvey, Louisiana. **WATSON** listed himself as the car salesman on the application. **WATSON** then transmitted the forged Dealer Funding Request Form on behalf of M.C. to USAA Financial.

25. On or about January 26, 2018, **WATSON** fraudulently obtained a deposit of approximately \$48,679.01 from USAA Financial into the Corporate Funders Inc. account at Jefferson Financial FCU via an interstate wiring through the Federal Reserve System.

26. On or about February 27, 2018, **WATSON** forged a Dealer Funding Request Form using the personal identifiers of K.K. in order to secure an automobile loan in the amount of approximately \$48,022.05 for the fraudulent purchase of a 2017 Audi Q5 sport’s utility vehicle, VIN- WA1D7AFP0HA036388, from Import Star, LLC, located at 1042 Cedar Park Ave in Baton Rouge, Louisiana. **WATSON** listed his alias of Alex Patel as the car salesman on the application. **WATSON** then transmitted the forged Dealer Funding Request Form on behalf of K.K. to USAA Financial.

27. On or about March 1, 2018, **WATSON** fraudulently obtained a deposit of approximately \$48,022.05 from USAA Financial into his personal account at Jefferson Financial FCU via an interstate wiring through the Federal Reserve System.

28. On or about March 19, 2018, **WATSON** completed a USAA Financial Dealer Funding Request Form using the personal identifiers of victim S.D. in order secure an automobile loan in the amount of approximately \$46,274.04 for the fraudulent purchase of a 2016 Lexus RX,

VIN-2T2BZMCA7GC011714, from Lapalco Motors, located at 5424 Lapalco Blvd., Marrero, Louisiana. **WATSON** listed one of his aliases, "Mohammed Khali," as the car salesman on the application. **WATSON** then transmitted the forged Dealer Funding Request Form on behalf of S.D. to USAA Financial.

29. On or about March 21, 2018, **WATSON** fraudulently obtained a deposit of approximately \$46,274.04 from USAA financial into the bank account of Corporate Funders Inc. at Jefferson Financial FCU via an interstate wiring through the Federal Reserve System.

All in violation of Title 18, United States Code, Section 371.

**COUNTS 2 - 4**  
**(Bank Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations contained in Parts A, C, and D of Count 1 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about the dates and in the approximate amounts listed below, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, for the purpose of executing the scheme and artifice to defraud set forth in Part C of Count 1, knowingly and willfully defrauded USAA Financial, the deposits of which were insured by the FDIC, and used stolen identities to obtain monies, funds, credits, and assets owned by and under the custody and control of USAA Financial by means of false and fraudulent pretenses, representations, and promises.

COUNT	Loan Application Date	Date Loan Received	Receiving Bank of Loan	Approximate Loan Amount	Vehicle	Stolen Identity Used for Transaction
2	1/10/18	1/26/18	Jefferson Financial FCU – Corporate Funders LLC	\$48,679.01	2017 Lexus SUV from A Better Car Company	M.C.
3	2/27/18	3/1/18	Jefferson Financial FCU – Christopher Watson	\$48,022.05	2017 Audi Q5 from Import Star LCC	K.K.
4	3/19/18	3/21/18	Jefferson Financial FCU – Corporate Funders LLC	\$46,274.04	2016 Lexus RX 350 from Lapalco Motors	S.D.

All in violation of Title 18, United States Code, Section 1344.

**COUNTS 5-7**  
**(Wire Fraud)**

**A. AT ALL TIMES MATERIAL HEREIN:**

The allegations contained in Parts A, C, and D of Count 1 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about the dates set forth below, in the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, for the purpose of executing and attempting to execute the scheme and artifice to defraud set forth in Part C of Count 1, did knowingly cause to be transmitted by means of wire communication in interstate commerce the writings, signs, signals, pictures, and sounds described below:

<b>COUNT</b>	<b>Date</b>	<b>Type of Wire</b>
5	1/26/18	An ACH transfer from USAA in San Antonio, Texas in the amount of \$48,679.01 routed via an interstate wire (computer) communication through a Federal Reserve server located outside of Louisiana and accessed by Jefferson Financial FCU in Kenner, Louisiana
6	3/1/18	An ACH transfer from USAA in San Antonio, Texas in the amount of \$48,022.05 routed via an interstate wire (computer) communication through a Federal Reserve server located outside of Louisiana and accessed by Jefferson Financial FCU in Kenner, Louisiana
7	3/21/18	An ACH transfer from USAA in San Antonio, Texas in the amount of \$46,274.04 routed via an interstate wire (computer) communication through a Federal Reserve server located outside of Louisiana and accessed by Jefferson Financial FCU in Kenner, Louisiana

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

**COUNT 8**  
**(Aggravated Identity Theft)**

A. The allegations contained in Parts A and B of Counts 1 through 4 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about January 10, 2018, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, did knowingly transfer, possess, and use without lawful authority, the means of identification of another person during and in relation to the offense of Bank Fraud contained in Count 2 of this Indictment, that is, he knowingly used the name of M.C., an actual person known to the grand jury, during and in relation to committing the offense of Bank Fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

**COUNT 9**  
**(Aggravated Identity Theft)**

A. The allegations contained in Parts A and B of Counts 1 through 4 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about February 27, 2018, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, did knowingly transfer, possess, and use without lawful authority, the means of identification of another person during and in relation to the offense of Bank Fraud contained in Count 3 of this Indictment, that is, he knowingly used the name of K.K., an actual person known to the grand jury, during and in relation to committing the offense of Bank Fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

**COUNT 10**  
**(Aggravated Identity Theft)**

A. The allegations contained in Parts A and B of Counts 1 through 4 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about March 19, 2018, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, did knowingly transfer, possess, and use without lawful authority, the means of identification of another person during and in relation to the offense of Bank Fraud contained in Count 4 of this Indictment, that is, he knowingly used the name of S.D., an actual person known to the grand jury, during and in relation to committing the offense of Bank Fraud in violation of Title 18, United States Code, Section 1344.

All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

**COUNT 11**  
**(Aggravated Identity Theft)**

A. The allegations contained in Parts A and B of Count 1 are hereby re-alleged and incorporated herein by reference.

**B. THE OFFENSE:**

On or about December 6, 2017, within the Eastern District of Louisiana and elsewhere, the defendant, **CHRISTOPHER WATSON**, did knowingly transfer, possess, and use without lawful authority, the means of identification of another person during and in relation to the offense of Wire Fraud, that is, he knowingly used the name of A.M., an actual person known to the grand jury, during and in relation to committing the offense of Wire Fraud in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1028A(a)(1), (c)(5).

**NOTICE OF FRAUD FORFEITURE**

1. The allegations of Counts 1, 5 through 7 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 371, 1343, 1344 and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offenses alleged in Counts 1, 5 through 7, the defendant, **CHRISTOPHER WATSON**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c), any and all property, real or personal, which constitutes or is derived from proceeds traceable to violations of Title 18, United States Code, Sections 371, 1343 and 1344.

3. If any of the property described above as being 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 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 371, 1343, 1344, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

#### **NOTICE OF BANK FRAUD FORFEITURE**

1. The allegations of Counts 2 through 4 of this Indictment are realleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1344 and 982(a)(2)(A).

2. As a result of the offense alleged in Counts 2 through 4, the defendant, **CHRISTOPHER WATSON**, shall forfeit to the United States any property, real or personal, constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of bank fraud, in violation of Title 18, United States Code, Section 1344.



3. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant:

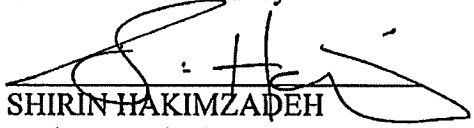
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot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

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b)(1) and Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Section 982.



PETER G. STRASSER  
United States Attorney

  
SHIRIN HAKIMZADEH  
Assistant United States Attorney

New Orleans, Louisiana  
May 2, 2019