

organization responsible for safeguarding the investing public against fraud and bad practice in
3. The Financial Industry Regulatory Authority ("FINRA") is a regulatory
industry.

United States Government that is responsible for, among other things, regulating the securities
2. The Securities and Exchange Commission ("SEC") is an agency of the
- on behalf of customers.

securities - such as stocks, bonds, mutual funds, annuities, and certain other investment products
representative," is a person or company that is in the business of buying and selling registered
1. A stock or securities "broker," also referred to as a "registered

At all times relevant to this indictment:

THE GRAND JURY CHARGES THAT:

COUNTS ONE THROUGH FIVE

INDICTMENT

| | |
|--|---------------------------|
| UNITED STATES OF AMERICA : | CRIMINAL NO. 16- |
| V. : | DATE FILED: June 30, 2016 |
| WILLIAM JOSEPH BOYLE : | VIOLATIONS: |
| 18 U.S.C. § 1341 (mail fraud - 5 counts) | |
| 18 U.S.C. § 1343 (wire fraud - 3 counts) | |
| 15 U.S.C. §§ 78j(b) and 78ff (securities fraud - | |
| 15 U.S.C. §§ 80b-6 and 80b-17 (investment | 1 count) |
| 15 U.S.C. § 1343 (wire fraud - 1 count) | |
| Notice of forfeiture | |

FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN THE UNITED STATES DISTRICT COURT

the securities industry. FINRA writes and enforces rules and regulations for every single brokerage firm and stock broker in the United States and examines stock brokers for compliance with FINRA's rules and the federal securities laws. FINRA is authorized by the SEC to license individuals to sell securities and to discipline licensed individuals and firms that fail to comply with federal securities laws and FINRA's rules and regulations. One of the methods of discipline is to suspend an individual's license(s) to sell securities that would be regulated by FINRA.

Another method of discipline is to permanently bar an individual from selling securities.

4. A "Series 6 License" is a license issued by FINRA that allows a person to sell a small number of specific types of securities such as mutual funds and variable annuities. In order to obtain a Series 6 License, a person must take and pass the Investment Company Products / Variable Life Contracts Representative Examination administered by FINRA. A person who holds only a Series 6 License cannot sell stocks. Defendant WILLIAM JOSEPH BOYLE received a Series 6 License on or about September 23, 1993.

5. A "Series 7 License" is a license issued by FINRA that is a mandatory requirement before a person can work as a registered representative to buy and sell stocks and other types of securities on behalf of customers in the United States. In order to obtain a Series 7 License, a person must take and pass the General Securities Representation Examination administered by FINRA. Defendant WILLIAM JOSEPH BOYLE received a Series 7 License on or about May 20, 1997.

6. A "Series 63 License" is a license issued by FINRA that is a mandatory requirement before a person can work as a registered representative to buy and sell stocks and other types of securities on behalf of customers in the United States within a particular state. Nearly all states require individuals to obtain a Series 63 License in order to register in that state

to sell securities. In order to obtain a Series 63 License, a person must take and pass the Uniform Securities Agent State Law Examination administered by FINRA. Defendant WILLIAM JOSEPH BOYLE received a Series 63 License on or about October 7, 1993.

7. A "Series 65 License" permits an individual to serve as an investment adviser. In order to obtain a Series 65 License, a person must take and pass the Uniform Investment Adviser Law Examination administered by FINRA. Defendant WILLIAM JOSEPH BOYLE received a Series 65 License on or about February 29, 2008.

8. From in or about September 1998 until in or about February 2006, defendant WILLIAM JOSEPH BOYLE was employed by Legg Mason Wood Walker, Inc. ("LMWW") as a stock broker, in Baltimore, Maryland.

9. From in or about February 2006 until in or about April 2007, defendant WILLIAM JOSEPH BOYLE was employed by Citigroup Global Markets, Inc., ("CGM") as a stock broker, in Bryn Mawr, Pennsylvania.

10. From in or about April 2007 until in or about November 2007, defendant WILLIAM JOSEPH BOYLE was employed by Janney Montgomery Scott, LLC ("JMS") as a stock broker, in Radnor, Pennsylvania.

11. In or about 2008, defendant WILLIAM JOSEPH BOYLE founded Life Financial Planning, LLC in Bala Cynwyd, Pennsylvania (hereinafter "Life Financial Planning"). Defendant BOYLE was the sole owner of Life Financial Planning.

12. On or about March 20, 2009, defendant WILLIAM JOSEPH BOYLE was permanently barred by FINRA from acting as a stock broker or otherwise associating in any capacity with a firm that sold securities to the public as a result of his misappropriation of over client funds. As a result, defendant BOYLE could no longer lawfully sell stocks, mutual, funds,

variable annuities, and other securities regulated by FINRA and could no longer hold himself out as an investment adviser or stock broker.

THE SCHEME

13. Beginning in or about February 2009 and continuing until in or about December 2015, within the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

14. Defendant WILLIAM JOSEPH BOYLE held himself out to former LFWW, CGM and JMS clients, and prospective clients, most of whom were elderly, as an experienced and licensed investment advisor, stock broker, and registered representative operating his own investment and financial planning company, Life Financial Planning.

15. Defendant WILLIAM JOSEPH BOYLE, solicited former clients and prospective clients, most of whom were elderly, to utilize his services as a financial adviser and invest with him through Life Financial Planning, without disclosing to the clients, either before or after they became clients, that he had been permanently barred by FINRA from acting as a stock broker or investment adviser or otherwise associating with a firm that sells securities to the public.

16. In soliciting client investments from existing and prospective clients, defendant WILLIAM JOSEPH BOYLE made numerous affirmative false statements, assurances, and representations to clients, including that: (a) defendant BOYLE was a licensed investment adviser; (b) client funds would be invested in stocks; (c) client funds would be invested in a fund

that defendant BOYLE described as the "Pennsylvania Fund"; (d) client funds would be invested in Pennsylvania municipal bonds; (e) client funds would be invested in real estate; (f) client funds would earn high rates of return; (g) client funds would be invested in safe, interest-bearing investments; and (h) client funds would be invested in "no risk" investments.

17. Defendant WILLIAM JOSEPH BOYLE induced clients to provide him with access to their accounts at brokerage and financial planning companies, such as Charles Schwab, and caused official checks to be issued from those accounts.

18. Defendant WILLIAM JOSEPH BOYLE forged client signatures on the official checks he caused to be issued from the clients' brokerage and financial planning accounts and obtained legitimate client signatures on such checks by misrepresenting to the clients the use of the funds.

19. Through these and other actions, affirmative misrepresentations, false assurances, and omissions of material fact, defendant WILLIAM JOSEPH BOYLE obtained approximately \$415,000 in client funds, which were provided to defendant BOYLE with the expectation and understanding that defendant BOYLE would invest the funds as he had represented to the clients.

20. Defendant WILLIAM JOSEPH BOYLE maintained an account ending in 0039 in the name of Life Financial Planning at Beneficial Bank, and made deposits of client funds into this account at Beneficial Bank branches in the Eastern District of Pennsylvania.

21. Defendant WILLIAM JOSEPH BOYLE did not invest his clients' funds as he had represented he would to his clients. Instead, defendant BOYLE used the funds for his own personal use, including: (a) withdrawing cash and writing checks made payable to defendant BOYLE himself; (c) providing funds to defendant BOYLE'S wife and ex-wife; (d) paying his

children's Catholic school tuition; (e) purchasing a liquor license for, and purchasing, renovating, and operate a bar called "The Blarney South Bar and Grille," which defendant BOYLE renamed "The Boyler Room," located in Philadelphia, Pennsylvania; and (f) making payments to earlier clients who had invested with defendant BOYLE, thereby inducing those earlier clients to believe that their investments were safe and profitable, which allowed defendant BOYLE to continue soliciting new investments from existing and prospective clients in order to continue his fraudulent scheme and his misappropriation of client funds for his own personal benefit.

22. At the time he solicited existing and prospective clients, defendant WILLIAM JOSEPH BOYLE did not inform the clients that he was using and would use their funds for his own personal use, to purchase, renovate, and operate "The Boyler Room" bar, and to make payments to clients who had earlier invested with defendant BOYLE. Instead, defendant BOYLE led his clients to believe that any funds they provided to him would be used to make the investments for the clients that defendant BOYLE had told them he would make.

23. Defendant WILLIAM JOSEPH BOYLE took numerous steps to conceal his scheme to defraud from detection, including: (a) mailing false and fabricated account statements to clients that purported to show, among other things, overall account activity since inception and included profitable account values; (b) communicating with clients by telephone and providing them with false reports of the safety of their investments; (c) communicating with clients by text message and telephone to assuage their concerns and stall their demands for repayment; (d) making sporadic payments to some clients using funds obtained from other clients in order to lull clients into believing that their investments were safe and profitable;

(e) falsely telling clients that their funds were lost in a bad investment; and (f) simply not returning clients' telephone calls when their financial investment became due.

24. In or about February 2009, defendant WILLIAM JOSEPH BOYLE induced one of his former LMWW and JMS clients, H.E.F., to transfer H.E.F.'s funds from JMS to a Charles Schwab account managed by defendant BOYLE, by representing to H.E.F. that he would serve as H.E.F.'s financial adviser and all investments and financial transactions would be handled through the Charles Schwab account.

25. In or about 2011, defendant WILLIAM JOSEPH BOYLE set up a trust account for a client, R.D., to provide for the financial needs of R.D.'s daughter, S.H., who resides in a psychiatric hospital. The account for the trust, called the "S.H. Special Needs Trust," was established at Charles Schwab and provided that funds could only be withdrawn upon the signatures of S.H.'s two siblings, J.D. and G.T., who acted as Trustees. Defendant BOYLE served as Financial Adviser to the Trust and managed its assets.

26. On or about June 13, 2011, defendant WILLIAM JOSEPH BOYLE induced E.G. to invest approximately \$100,000 with Life Financial Planning via a Charles Schwab certified check, number 1008048, which defendant BOYLE caused to be deposited into Life Financial Planning's account ending in 0039 at Beneficial Bank in the Eastern District of Pennsylvania, by representing to E.G. that defendant BOYLE would manage the funds and invest them for E.G.'s benefit. Prior to this deposit, the Life Financial Planning account ending in 0039 had a balance of only approximately \$310.

27. Defendant WILLIAM JOSEPH BOYLE did not invest the \$100,000 provided by E.G. for E.G.'s benefit. Instead, between on or about June 14, 2011 and on or about June 28, 2011, defendant WILLIAM JOSEPH BOYLE withdrew from Life Financial Planning's

Beneficial Bank account ending in 0039 for his own personal benefit approximately \$95,000 of the \$100,000 provided by E.G.

28. On or before November 11, 2012, defendant WILLIAM JOSEPH BOYLE told J.D., as Trustee for the S.H. Special Needs Trust, that defendant BOYLE wished to withdraw approximately \$180,000 from the S.H. Special Needs Trust. Defendant BOYLE falsely told J.D. that: (a) the funds would be invested in "real estate"; (b) there would be "no risk"; (c) the funds would earn approximately 9% interest per year; and (d) the funds would be returned to the Charles Schwab account within one year. In reliance upon these false representations, J.D. agreed to the investment.

29. On or about November 11, 2012, defendant WILLIAM JOSEPH BOYLE caused Charles Schwab to issue two checks from the S.H. Special Needs Trust account ending in 4870: check number 1030653 in the amount of approximately \$80,000 and check number 1030656 in the amount of approximately \$100,000, and induced J.D. to sign both checks by misrepresenting to J.D. the use to which defendant BOYLE would put the funds and by falsely representing to J.D. that defendant BOYLE would also obtain the signatures of G.T. on the checks, as the signatures of both J.D. and G.T. were required before Charles Schwab would release the funds.

30. On or about November 11, 2012, defendant WILLIAM JOSEPH BOYLE forged the signatures of G.T. on the two Charles Schwab checks drawn from the S.H. Special Needs Trust: check number 1030653 in the amount of approximately \$80,000 and check number 1030656 in the amount of approximately \$100,000, and caused both checks to be deposited into Life Financial Planning's account ending in 0039 at Beneficial Bank in the Eastern District of Pennsylvania. Prior to this deposit, this account had a balance of only approximately \$1,500.

31. Defendant WILLIAM JOSEPH BOYLE did not invest S.H.'s funds as defendant BOYLE had represented he would to J.D. Instead, between on or about November 17, 2012 and on or about December 18, 2012, defendant WILLIAM JOSEPH BOYLE withdrew from Life Financial Planning's Beneficial Bank account ending in 0039 for his own personal benefit approximately \$168,306 of the funds provided by J.D., as Trustee for the special needs trust in the name of S.H.

32. On or about June 26, 2013, defendant WILLIAM JOSEPH BOYLE induced T.K. to invest approximately \$100,000 with Life Financial Planning via Charles Schwab certified check number 9150972 from the account of T.K., which defendant BOYLE caused to be deposited into Life Financial Planning's account ending in 0039 at Beneficial Bank in the Eastern District of Pennsylvania, by representing to T.K. that the funds would be invested in stocks. Prior to this deposit, the account ending in 0039 had a balance of only approximately \$1,588.

33. Defendant WILLIAM JOSEPH BOYLE did not invest T.K.'s funds as defendant BOYLE had represented he would. Instead, between on or about July 8, 2013 and on or about July 12, 2013, defendant WILLIAM JOSEPH BOYLE withdrew from Life Financial Planning's Beneficial Bank account ending in 0039 for his own personal benefit approximately \$98,478 of the funds provided by T.K.

34. On or about October 4, 2013, defendant WILLIAM JOSEPH BOYLE sent a letter to E.G. by U.S. Mail instructing E.G. to sign a check for approximately \$400 that defendant BOYLE had caused to be written from E.G.'s account at Charles Schwab, which defendant BOYLE indicated would be his "3rd Quarter 2013 fee." Defendant BOYLE enclosed an envelope addressed to Life Financial Planning at an address in Conshohocken, Pennsylvania.

35. On or about March 6, 2014, defendant WILLIAM JOSEPH BOYLE met with H.E.F. at her home in the Eastern District of Pennsylvania and induced H.E.F. to endorse a Charles Schwab check, number 1051595 in the amount of approximately \$35,000, which defendant BOYLE had caused to be issued from H.E.F.'s Charles Schwab account that defendant BOYLE managed, by false representing to H.E.F. that the funds would be used to purchase a two-year Pennsylvania municipal bond for H.E.F., which defendant BOYLE falsely represented would earn approximately 3.75% interest per year.

36. On or about March 6, 2014, defendant WILLIAM JOSEPH BOYLE caused Charles Schwab check, number 1051595 drawn from the account of H.E.F., in the amount of approximately \$35,000, to be deposited into Life Financial Planning's account ending in 0039 at Beneficial Bank in the Eastern District of Pennsylvania. Prior to this deposit, the account ending in 0039 had a balance of only approximately \$2,216.

37. Defendant WILLIAM JOSEPH BOYLE did not invest H.E.F.'s funds in Pennsylvania municipal bonds as defendant BOYLE had represented he would. Instead, between on or about March 11, 2014 and on or about March 27, 2014, defendant WILLIAM JOSEPH BOYLE withdrew from Life Financial Planning's Beneficial Bank account ending in 0039 for his own personal benefit approximately \$30,581 of the funds provided by H.E.F., and used withdrew another approximately \$1,030 of H.E.F.'s funds to make a payment to the S.H. Special Needs Trust.

38. On or about April 15, 2014, at "The Boyler Room" bar in Philadelphia, Pennsylvania, defendant WILLIAM JOSEPH BOYLE falsely told G.T. that the approximately \$180,000 provided to defendant BOYLE by J.D. as Trustee for the S.H. Special Needs Trust was "tied up" in several different strip malls and office buildings and could not be returned at that

time, although defendant BOYLE suggested that he might be able to obtain \$40,000 to return to the S.H. Special Needs Trust.

39. On or about May 6, 2014, defendant WILLIAM JOSEPH BOYLE sent text messages from his cellular phone in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey, in which defendant BOYLE represented to G.T. that he was working on obtaining approximately \$40,000 as partial repayment of the approximately \$180,000 he had caused to be withdrawn from the S.H. Special Needs Trust, and told G.T. to "have faith" and "it will all work out."

40. On or about May 28, 2014, defendant WILLIAM JOSEPH BOYLE sent a text message from his cellular phone in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey, in which defendant BOYLE represented to G.T. that he was attempting to find a way to repay the approximately \$180,000 he had caused to be withdrawn from the S.H. Special Needs Trust.

41. On or about July 3, 2014, defendant WILLIAM JOSEPH BOYLE caused a false Life Financial Planning financial statement to be mailed to H.E.F. in Garnet Valley, Pennsylvania, that falsely indicated H.E.F.'s funds had been invested in the "PA Fund" and that she had accrued interest through June 15, 2014.

42. On or about July 13, 2014, defendant WILLIAM JOSEPH BOYLE sent a text message from his cellular phone in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey, in which defendant BOYLE represented to G.T. that he was attempting without success to obtain a loan to repay the approximately \$180,000 he had caused to be withdrawn from the S.H. Special Needs Trust.

43. On or about February 20, 2015, at "The Boyler Room" bar in Philadelphia, Pennsylvania, defendant WILLIAM JOSEPH BOYLE falsely told G.T. that the approximately \$180,000 that defendant BOYLE had withdrawn from the S.H. Special Needs Trust had matured to approximately \$197,950 and was invested in three different real estate deals, one of which was "The Boyler Room" and the other two he did not know the addresses, and promised to send G.T. a statement as to the location of the funds.

44. On or about March 17, 2015, defendant WILLIAM JOSEPH BOYLE caused a letter to be sent to G.T. from Philadelphia, Pennsylvania, to Brigantine, New Jersey, via United States Postal Service Priority Mail Express in which defendant BOYLE represented to G.T. that the approximately \$180,000 that defendant BOYLE had withdrawn from the S.H. Special Needs Trust was "pooled" and was accruing "5% interest" and had been invested in the following: (a) "Boyler Room LTD" in the amount of \$125,000; (b) 107 W. 3rd Ave, Conshohocken, Pennsylvania in the amount of \$25,000; and (c) 1601 Spring Garden St, Unit 200, Philadelphia, Pennsylvania in the amount of \$30,000.

45. Defendant WILLIAM JOSEPH BOYLE, by his actions as set forth herein, caused his clients to sustain losses of more than \$415,000.

46. On or about each of the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

for the purpose of executing the scheme described above, and attempting to do so, knowingly caused to be delivered by mail and commercial interstate carriers, according to the directions thereon, the following items:

| COUNT | DATE | FROM | TO | DESCRIPTION OF ITEM |
|-------|---------|--|---------------------------------|---|
| ONE | 7/12/13 | Life Financial Planning | T.K., Drexel Hill, Pennsylvania | Letter re "2 nd Qtr. Advisor Fee 2013" |
| TWO | 10/4/13 | Life Financial Planning | E.G., Malvern Pennsylvania | Letter from defendant WILLIAM JOSEPH BOYLE as "Investment Advisor" |
| THREE | 1/8/14 | Life Financial Planning | T.K., Drexel Hill, Pennsylvania | Letter re "4 th Qtr. Advisor Fee 2013" and self-addressed stamped envelope addressed to Life Financial Planning in Bala Cynwyd, Pennsylvania |
| FOUR | 7/3/14 | Life Financial Planning | H.E.F., Garnet Valley, PA | Life Financial Planning Financial statement sent via U.S. Mail |
| FIVE | 3/13/15 | Defendant WILLIAM JOSEPH BOYLE, Philadelphia, PA | G.T., Brigantine, New Jersey | Two-page letter sent via United States Postal Service Priority Mail Express, Tracking Number EK745496592US. |

All in violation of Title 18, United States Code, Section 1341.

COUNTS SIX THROUGH EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 of Counts One through Five are incorporated here.

THE SCHEME

2. Beginning in or about February 2009 and continuing until in or about December 2015, within the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

devised and intended to devise a scheme to defraud and to obtain money and property by means of false and fraudulent pretenses, representations, and promises.

MANNER AND MEANS

3. Paragraphs 14 through 45 of Counts One through Five are incorporated here.

4. On or about each of the following dates, in the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

for the purpose of executing the scheme described above, and attempting to do so, caused the following signals and sounds to be transmitted by means of wire communication in interstate commerce:

| COUNT | DATE | DESCRIPTION |
|--------------|-------------|---|
| SIX | 5/6/14 | Text message sent from the cellular phone of defendant WILLIAM JOSEPH BOYLE in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey |

| COUNT | DATE | DESCRIPTION |
|-------|---------|---|
| SEVEN | 5/28/14 | Text message sent from the cellular phone of defendant WILLIAM JOSEPH BOYLE in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey |
| EIGHT | 7/13/14 | Text message sent from the cellular phone of defendant WILLIAM JOSEPH BOYLE in the Eastern District of Pennsylvania to the cellular telephone of G.T. in the District of New Jersey |

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

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 and 14 through 45 of Counts One through Five are incorporated here.

SECURITIES FRAUD

2. Beginning in or about February 2009 and continuing until in or about December 2015, within the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

knowingly and willfully used and employed manipulative and deceptive devices and contrivances, contrary to Rule 10b-5 of the Rules and Regulations of the United States Securities and Exchange Commission (Title 17, Code of Federal Regulations, Section 240.10b-5), by (a) employing devices, schemes and artifices to defraud; (b) making untrue statements of material fact and omitting to state material facts necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading; and (c) engaging in acts, practices, and courses of business which would and did operate as a fraud and deceit upon investors and potential investors in connection with the purchases and sales of investments, directly and indirectly, by use of the means and instrumentalities of interstate and foreign commerce and the mails.

All in violation of Title 15, United States Code, Sections 78j(b) and 78ff.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 12 and 14 through 45 of Counts One through Five are incorporated here.
2. At all times relevant to this indictment, defendant WILLIAM JOSEPH BOYLE was an “investment adviser” within the meaning of Title 15, United States Code, Section 80b-2(a)(11).

INVESTMENT ADVISER FRAUD

3. Beginning in or about February 2009 and continuing until in or about December 2015, within the Eastern District of Pennsylvania and elsewhere, defendant

WILLIAM JOSEPH BOYLE

unlawfully, willfully, and knowingly, by the use of the mail and means and instrumentalities of interstate commerce, directly and indirectly: (a) employed devices, schemes and artifices to defraud clients and prospective clients; (b) engaged in transactions, practices, and courses of business which operated as a fraud and deceit upon clients and prospective clients; and (c) engaged in acts, practices, and courses of business that were fraudulent, deceptive, and manipulative.

All in violation of Title 15, United States Code, 80b-6, and 80b-17.

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

1. As a result of the violations of Title 18, United States Code, Section 1341 and 1343 and Title 15, United States Code, Section 78ff set forth in this indictment, defendant

WILLIAM JOSEPH BOYLE

shall forfeit to the United States of America any property constituting, or derived from, proceeds obtained directly or indirectly from the commission of such offense, including but not limited to \$415,000 in United States currency (money judgment).

2. If any of the property described above, as a result of any actor omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred to, sold to, or deposited with a third party;
- c. has been placed beyond the jurisdiction of this 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 intention of the United States, pursuant to 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, Section 981(a)(1)(C) and 28 U.S.C. Section 2461.

A TRUE BILL:

GRAND JURY FOREPERSON



ZANE DAVID MEMEGER
UNITED STATES ATTORNEY