

electricity, in an amount exceeding or which would have exceeded \$100,000, and to cause a significant interruption and impairment of a function of an energy facility.

18 U.S.C. § 1366(a)

FORFEITURE NOTICE

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 18 U.S.C. § 981(a)(1)(C) and (G), and 28 U.S.C. § 2461(c), as a result of any defendant's conviction under this Indictment.

2. Upon conviction of the offense alleged in this Indictment, the defendants,

**SARAH BETH CLENDANIEL
and
BRANDON CLINT RUSSELL**

shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offense, and pursuant to 18 U.S.C. § 981(a)(1)(G) and 28 U.S.C. § 2461(c), all assets, foreign or domestic, derived from, involved in, or used or intended to be used to commit any Federal crime of terrorism against the United States.

3. The property to be forfeited includes, but is not limited to, the following:

- a. one Kral Av Sanayi/Remimex semi-automatic 12 gauge shotgun bearing serial number KRC003624;
- b. one P80 Glock-style handgun, gray in color with a black side, bearing no serial number or manufacturer;
- c. 559 rounds of 9 mm ammunition;
- d. 953 rounds of 7.62 mm ammunition; and
- e. 77 shotgun cartridges.

Substitute Assets

4. If, as a result of any act or omission by any of the defendants, any of the property subject to forfeiture, identified above:

- 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,

the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C.

§ 853(p), as incorporated by 28 U.S.C. § 2461(c).

18 U.S.C. § 981(a)(1)(C), (G)

21 U.S.C. § 853(p)

28 U.S.C. § 2461(c)

A TRUE BILL:

2/14/2023

SIGNATURE REDACTED

Per person

Erek L. Barron
Erek L. Barron
United States Attorney