UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

OBIOMA IWOBI,

Defendant.

SEALED INDICTMENT

23 Cr.

25 CRIM 541

COUNT ONE (Obstruction of Justice)

The Grand Jury charges:

1. In or about March 2023, in the Southern District of New York and elsewhere, OBIOMA IWOBI, the defendant, corruptly obstructed, influenced, and impeded an official proceeding, and attempted to do so, to wit, IWOBI caused false and fraudulent letters to be submitted, and caused false and misleading statements to be made, to a federal judge, in connection with a sentencing proceeding in the case, *United States v. Obioma Iwobi*, 22 Cr. 00652 (ER), in order to obtain a more lenient sentence.

(Title 18, United States Code, Sections 1512(c) and 2.)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, OBIOMA IWOBI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

- 3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:
 - cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - has been placed beyond the jurisdiction of the Court;
 - d. has been substantially diminished in value; or
 - 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) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

DAMIAN WILLIAMS United States Attorney