

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No.

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. \$81,963.74 FROM AMERICAN FIRST NATIONAL BANK ACCOUNT NO. 1050809603;
2. ALL FUNDS UP TO \$50,000.00 HELD IN INTRUST BANK ACCOUNT NO. 99880485;
3. \$97,083.00 FROM HANMI BANK ACCOUNT NO. 1904739;
4. \$30,000.00 FROM JP MORGAN CHASE BANK ACCOUNT NO. 3380658632;
5. \$12,667.73 FROM JP MORGAN CHASE BANK ACCOUNT NO. 810121009;
6. \$12,992.91 FROM BANK OF AMERICA ACCOUNT NO. 435039808644;
7. \$1,827.00 FROM PNC BANK ACCOUNT NO. 5346583816;
8. \$50,000.00 FROM WELLS FARGO BANK ACCOUNT NO. 2000012034758;
AND
9. \$5,801.30 FROM JP MORGAN CHASE BANK ACCOUNT NO. 958694770;

Defendants.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM*

COMES NOW the United States of America (the "United States"), by and through United States Attorney Robert C. Troyer and Assistant United States Attorney Tonya S. Andrews, and pursuant to 18 U.S.C. § 981(a)(1)(A) and (C), and Rule G(2) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, states as follows:

JURISDICTION AND VENUE

1. This Court has subject matter and in rem jurisdiction pursuant to 28 U.S.C. § 1355(b), which provides that a forfeiture action may be brought in the district in which any of the acts or omissions giving rise to the forfeiture occurred. As set forth below, some of the acts giving rise to the forfeiture occurred in the District of Colorado.

2. This Court has venue pursuant to 28 U.S.C. § 1395(a) and (c), which provides that civil forfeiture proceeding may be prosecuted in the district where it accrues and in any district into which the property has been brought. As set forth below, the forfeiture proceeding accrues in the District of Colorado as some of the acts giving rise to the forfeiture occurred in the District of Colorado. In addition, all of the defendant assets have been brought into the District of Colorado.

DEFENDANT ASSETS

3. Defendant assets are more fully described as:
- a) \$81,963.74 seized on October 4, 2017, during the execution of a federal seizure warrant from American First National Bank, Account No. 1050809603 (“defendant American First National Bank Account No. 9603”);
 - b) All funds up to \$50,000.00 held in Intrust Bank Account No. 99880485 (“defendant Intrust Bank Account No. 0485”);
 - c) \$97,083.00 seized on June 5, 2017, during the execution of a federal seizure warrant from Hanmi Bank Account No. 1904739 (“defendant Hanmi Bank Account No. 4739”);
 - d) \$30,000.00 seized on May 25, 2017, during the execution of a

federal search warrant from JP Morgan Chase Bank, Account No.

3380658632 (“defendant JP Morgan Chase Bank Account No. 8632”);

e) \$12,667.73 seized on May 25, 2017, during the execution of a

federal seizure warrant from JP Morgan Chase Bank, Account No.

810121009 (“defendant JP Morgan Chase Bank Account No. 1009”);

f) \$12,992.91 seized on May 25, 2017, during the execution of a

federal seizure warrant from Bank of America, Account No.

435039808644 (“defendant Bank of America Account No. 8644”);

g) \$1,827.00 seized on October 9, 2017, during the execution of a

federal seizure warrant from PNC Bank, Account No. 5346583816

(“defendant PNC Bank Account No. 3816”);

h) \$50,000.00 seized on October 4, 2017, during the execution of a

federal seizure warrant from Wells Fargo Bank, Account No.

2000012034758 (“defendant Wells Fargo Bank Account No. 4758”); and

i) \$5,801.30 seized on February 10, 2017, during the execution of a

federal seizure warrant from JP Morgan Chase Bank, Account No.

958694770 (“defendant JP Morgan Chase Bank Account No. 4770”).

All defendant assets are in the possession of the United States Marshals Service or the Federal Bureau of Investigation located in Denver, Colorado.

FACTUAL BASIS FOR FORFEITURE

4. Except as otherwise noted, all of the following facts and information have been discovered through my own investigation and observations, and the observations and investigations of fellow law enforcement officers as reported to me.

BACKGROUND

5. On or about November 2016, FBI Denver Division was contacted by Debbie Muhlhauser, Vice President, Internal Audit Great-West Financial (“Great-West”) with the referral of a matter involving allegations of fraudulent transfers from clients’ 401K accounts from JP Morgan. At the time of the report, Great-West Financial had 20 participants affected and a loss of at least \$1 million dollars with a potential loss in excess of \$2 million.

6. Great-West’s corporate headquarters is located at 8515 E. Orchard Road, Greenwood Village, Colorado 80111.

7. The matter arose from a referral from Debbie Muhlhauser, Vice President, Internal Audit Great-West Financial (“Great-West”) on or about November 2016 to the FBI Denver Division. The referral involved allegations of the fraudulent transfers from clients’ 401K accounts.

8. Great-West serves as a record keeper for employer 401K plans. As a record keeper, Great-West is also referred to as a plan sponsor. Although it has yet to be determined why specific accounts were targeted, requests for withdrawals were received and the requestor was able to provide the plan participants’ biographical data, i.e. name, social security numbers, date of birth, and employment data. Because the

requests were authenticated with the plan participants' identifiers, the perpetrator was able to make changes to the accounts and facilitate the withdrawals. Since Great-West's initial referral, Muhlhauser advised that Great-West continues to identify fraudulent disbursements from participants' accounts.

9. Great-West provided a general explanation of how the unauthorized transfers were accomplished. An individual plan participant establishes an account online. The Great-West call center assists as needed when contacted by a plan participant. The call center uses a four-part authentication process using biographical identifiers for the plan participant. The plan participant is provided a distribution form via either email or mail. Once a plan participant has access to an account, information can be changed or updated and disbursements can be requested. Based on Great-West's investigation, it appears that unauthorized individual(s) have been fraudulently using this process to obtain access to funds held in retirement accounts for which Great-West was the plan sponsor. These unauthorized individuals have caused funds to be transferred from those retirement accounts to other bank accounts without the consent or knowledge of the plan participant/account holder.

10. Between December 20, 2016 and April 21, 2017, your affiant spoke with Senior Investigator Bill Fountain from Voya Financial, Senior Assistant General Counsel Allison Brecher from Mercer Pension, and Assistant General Counsel Huda Ahmed from Nationwide regarding fraudulent account takeovers affecting their institutions. During my investigation, some of the initial recipients of the funds fraudulently transferred from Great-West also received funds from other institutions or

sources identified as fraudulent. These additional entities advised of being recently targeted by similar financial fraud schemes as the one impacting Great-West.

INVESTIGATION OF JEANETTE DELONG

11. One of the bank accounts identified by Great-West as a recipient of an unauthorized disbursement was JP Morgan Chase account 789061137 in the name of Jeanette Delong (“Delong JP Morgan Account”).

12. JP Morgan Chase provided additional details regarding the funds received by the Delong JP Morgan Account from Great-West:

- a. The Delong JP Morgan Account was opened on December 15, 2015 by Jeanette Ann Delong using a California driver’s license;
- b. The funds received by Delong JP Morgan Account were disbursed from a retirement account in the name of “C.G.”, a CSX employee.

13. According to Supervisory Special Agent Robert Roisson with the CSX Railroad Police, C.G. did not request a withdrawal from his account nor did he authorize Delong to act as a recipient of funds from his account.

Interview of Delong

14. On January 4, 2017, investigators interviewed Jeanette Delong (“Delong”), and Delong stated that she thought the funds wired to her account were proceeds from an investment opportunity she entered into in 2008 with Steven Thompson.

15. Delong stated in 2008 when she lived in the Medford, Oregon area, she met investors through acquaintances at church. She and five or six other individuals were presented with an opportunity to invest in a company involved in an oil project in

Nigeria.

16. Delong stated she invested \$100,000 with an individual named Steven Thompson related to contracts he had in place between himself and the Nigerian National Petroleum Corporation (“NNPC”). Delong believes the total investment among everyone was approximately \$400,000.00.

17. Delong stated the investment was conveyed verbally and that she never executed a formal investment agreement.

18. Delong stated she collected some of the funds from the other investors and sent those funds to Thompson via Western Union, Money Gram, or direct deposit to an account in Nairobi.

19. Delong stated she told Thompson she just wanted her funds back, Thompson replied that he would send her funds and then Delong could distribute the funds. Delong told Thompson she did not want the funds in her account because she did not want to pay taxes on it. Thompson told Delong he was sending the funds to her through a friend’s account because he could not send it all directly. Thompson told her the money has to go to some other people first.

20. Delong stated she received three transfers to her account:

- a. \$100,000.00;
- b. \$200,000.00 approximately; and
- c. \$456,000.00 received the last week of November or first week of December.

21. Delong stated within the first week of receiving funds, she paid off bills

approximately worth \$20,000.00.

22. Delong stated she also purchased a used 2013 Jeep Cherokee with the original \$100,000.00 transfer without a trade-in.

23. According to Delong, Thompson told Delong the funds were repayment from that investment and instructed Delong to wire funds to additional recipients.

24. Delong insisted that she thought the funds she received were proceeds from an investment, but a review of Yahoo Messenger exchanges between Delong and Thompson indicate that she wanted payments structured in a way that would not trigger an investigation or look suspicious. The following exchange occurred on November 7, 2016, between Delong and Thompson:

Thompson: "Am gonna need you to make a cash deposit hun"

Delong: "How much and who"

Thompson: "10k"

Delong: "That is not a good idea. It should be 8k or less. 10k cash withdrawal or deposit with cash will trigger an investigation accordingly to my banker"

Thompson: "Okay 8k then"

Delong: "We don't need anything that will be looking suspicious or maybe we can just do 5k".

25. On January 5, 2017, Delong forwarded to investigators the list of individuals to whom Thompson instructed Delong to wire funds. On the list, was an instruction to wire \$65,000 to Ahmer R. Naqvi of Kew Gardens, New York, JP Morgan Chase account number 958694770.

26. On January 14, 2017, investigators informed Mrs. Delong during the initial

interview, that she was not to send any additional transactions to Steven Thompson on Steven Thompson's behalf, and she was not to do anything with the Jeep.

27. On February 15, 2017, Mrs. Delong had no rebuttal when questioned about the transactions that occurred after the initial interview on January 14, 2017.

Analysis of Stolen Funds

28. On November 2, 2016, the Delong JP Morgan Account received \$307,821.13 from an Empower Retirement account in the name of C.G., a CSX employee.

29. On November 9, 2016, the Delong JP Morgan Account received an additional \$456,000.00 from an Empower Retirement account in the name of C.G., a CSX employee.

30. On November 9, 2016 and November 10, 2016, Delong transferred \$105,000.00 into an American Express Personal Savings account.

31. Many of these fraudulent funds were subsequently transferred to third party bank accounts as described below.

American First National Bank Account No. 1050809603

32. On November 2, 2016, Delong wired \$95,500.00 to an account held by SGP Trading, Inc. (SGP) at Hanmi Bank in California.. The account was set up by Raza Ahmmed. Ahmmed closed the Hanmi Bank account in May 2017, receiving the balance of the cashier's check made payable to SGP Trading, Inc. The cashier's check was deposited on June 6, 2017, at America First National Bank in Houston, Texas account # 1050809603 in the name of SGP Trading Inc.

33. On October 4, 2017, \$81,963.74 was seized from American First National Bank account of SGP account no. 1050809603 as proceeds traceable to the Great West financial fraud.

Intrust Bank Account No. 99880485

34. On November 9, 2016, Delong wired \$50,000.00 to a sweep account in Intrust Bank Account no. 99880485. The signers on the account include Robert E. Rasberry, Kye Whitehead, Yvonne Nielson, Tracy Gordon, Michelle Parks, and Daniel N. Wiese.

35. Based on the information above, there is probable cause to believe that at least \$50,000.00 in the Intrust Bank account no. 99880485 are traceable to the Great-West financial fraud.

Hanmi Bank Account No. 1904739

36. On November 14, 2016, Delong wired \$100,000.00 from the Delong JP Morgan Chase account to Hanmi Bank account 1904739 held in the name of ZG International, LLC (ZG).

37. On June 5, 2017, \$97,083.00 was seized from Hamni Bank account no. 1904739 as proceeds traceable to the Great-West financial fraud.

JP Morgan Bank Account No. 3380658632

38. On November 5, 2016, Delong also sent a cashier's check to Ahmer R. Naqvi in the amount of \$65,000.00. On November 14, 2016, Naqvi transferred approximately \$30,000.00 to his JP Morgan Chase Savings account no. 3380658632. He was the sole signor on this account.

39. On May 25, 2017, \$30,000.00 was seized from JP Morgan Chase Savings account no. 3380658632 belonging to Ahmer R. Naqvi as proceeds traceable to the Great West financial fraud.

Chase Bank Account No. 958694770

40. Ahmer Naqvi opened Chase Bank account no. 958694770 on April 21, 2011, and was the sole signor on the account.

41. On November 5, 2016, Delong sent a cashier's check to Ahmer R. Naqvi in the amount of \$65,000.00, which Naqvi deposited into Chase account 958694770.

42. On November 14, 2016, Ahmer R. Naqvi transferred approximately \$30,000.00 to his JP Morgan Chase Bank Account no. 3380658632.

43. On February 10, 2017, \$5,801.30 was seized from JP Morgan Chase account no. 958694770 as proceeds traceable to Great-West Financial.

INVESTIGATION OF PATRICIA FISHER

44. Another bank account identified by Great-West as a recipient of unauthorized disbursements was held in the name of Patricia M. Fisher.

45. Fisher received two wires from the retirement account of CSX employee "T.M." CSX confirmed that T.M. did not authorize the transfers.

46. On November 2, 2016, Fisher's Citizen's Bank account received wires in the amount of \$49,775.00 and \$36,827.72 from Empower Retirement.

47. On November 3, 2016, Fisher sent a cashier's check paid to the order of BN recycle, LLC in the amount of \$30,000.00.

48. The cashier's check to BN Recycle, LLC was deposited in PNC Bank account no. 5346583816. The PNC Bank account no. 5346583816 was set up by Bao Pham created at PNC Bank located in Pittsburgh, Pennsylvania.

INTERVIEW OF BAO PHAM, OWNER OF BN RECYCLE, LLC

49. On April 11, 2017, CSX agents interviewed Bao Pham, the owner of BN Recycle, LLC. He set up a PNC Bank account in the name of BN Recycle, LLC.

50. Pham stated that he sends bulk shipments of cellular phones to ZG International, LLC in exchange for cash.

51. When Pham was asked about the \$30,000.00 cashier's check from Patricia Fisher, Pham stated he was unable to explain why he had received it. Pham stated he was under the impression it was from ZG International, LLC for the cell phone business and did not know the check was from Patricia Fisher.

52. When the CSX investigators informed Pham that the \$30,000.00 was stolen, Pham stated he was not aware the funds were stolen and he would return or repay any funds that were stolen.

53. On April 12, 2017, investigators contacted Pham about returning the funds, and Pham stated he would not return the funds unless compelled to do so (by the government or the victims of the fraud).

54. On October 9, 2017, \$1,827.00 was seized from PNC Bank account of BN Recycle, LLC, account no. 5346583816, as proceeds traceable to the Great West financial fraud.

INVESTIGATION OF JAMES HENSCHEL

55. One of the bank accounts identified by Great-West as a recipient of an unauthorized disbursement was held in the name of James Henschel. Mr. Henschel opened a Bank of America account no. 435039808644, held in his name. He is the only signor.

Analysis of Stolen Funds

56. Financial analysis reveals that Henschel is receiving wires from multiple fraud schemes and appears to have no personal income coming into the account other than small dollar amount cash deposits.

57. On September 6, 2016, Henschel received an unauthorized disbursement into a JP Morgan Chase account in the amount of \$22,400.00 from a New York State retirement account in the name of "R.K."

58. On September 14, 2016, Henschel received another unauthorized disbursement into the same JP Morgan Chase account in the amount of \$72,000.00 from a New York State retirement account in the name of "P.S." These funds were stolen in a separate fraud scheme targeting Nationwide Insurance retirement accounts.

59. On September 14, 2016, Henschel wire transferred \$70,000.00 from his JP Morgan Chase account into his Bank of America account no. 435039808644, held in the name of James M. Henschel.

60. On October 31, 2016, Henschel's Bank of America account no. 8644 received \$50,000.00 from a third party. On November 14, 2016, \$32,000.00 was transferred into Henschel's Bank of America account no. 8644 from the same person.

The third party had received these funds in an unauthorized disbursement from a TriHealth (a Great-West plan sponsor) account in the name of "D.P."

61. On November 14, 2016, Henschel also received an unauthorized disbursement in the amount of \$68,667.81 from the TriHealth account of "D.P."

62. On November 16, 2016, Henschel's Bank of America account no. 8644 received \$73,000.00. These funds came from another third party who had received them through an unauthorized transfer from the TriHealth account of "J.T."

63. From September 19, 2016 to November 22, 2016 James Henschel conducted multiple wire transfers out of this Bank of America account to an international account located in Malaysia.

64. On November 30, 2016, Bank of America closed account no. 435039808644, fraudulent activity suspected and held all remaining funds.

65. On May 25, 2017, \$12,992.91 was seized from Bank of America account no. 435039808644.

INVESTIGATION OF IRENE PORTER

66. One of the accounts identified by Great-West as a recipient of an unauthorized disbursement was held in the name of Irene Porter.

67. On April 11, 2016, Irene Porter received a wire transfer from United Federal Credit Union in the amount of \$9,000.00 into J.P. Morgan Chase Bank account no. 810121009. This wire was received as a result of a separate fraud scheme and was used to open the J.P. Morgan Chase Bank account. The account was opened in her name and Porter was the only signor.

68. On April 18, 2016, Porter received an unauthorized disbursement in the amount of \$102,612.01 into her J.P. Morgan Chase Bank account no. 810121009 from Rochester General Hospital, Fascore MetLife (a Great-West plan sponsor) in the name of "S.E." After suspicious activity, J.P. Morgan Chase Bank closed this account and moved all the remaining funds into an internal J.P. Morgan Chase Bank suspense account. The amount remaining in the suspense account is \$12,667.73.

69. On May 25, 2017, \$12,667.73 was seized from J.P. Morgan Chase Bank suspense account no. 810121009.

INVESTIGATION OF MANDY SHERMAN

70. Another bank account identified by Great-West as a recipient of unauthorized disbursements was held in the name of Mandy L. Sherman

71. Sherman received one ACH from the retirement account of American Electric Power System employee "R.B."

72. On October 12, 2016, Sherman's AERO Federal Credit Union account received ACH in the amount of \$53,865.36 from Empower Retirement.

73. On October 14, 2016, Sherman wired \$50,000.00 to Wells Fargo Bank account 200012034758 held by Elite Sports Management International, Inc. The account was set up by Hussein H. Makke. Signers on the account include Makke and Kimberly Saddic.

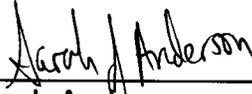
74. On October 4, 2017, \$50,000.00 was seized from Wells Fargo Bank account no. 2000012034758 as proceeds traceable to the Great-West financial fraud.

CONCLUSION

75. From approximately November 2016 through February 2017, the evidence indicates that Jeanette Delong, Patricia Fisher and James Henschel participated in a scheme, by which they obtained proceeds derived from retirement accounts held at Denver based Great-West Financial in violations of wire fraud and money laundering. The evidence further indicates that the fraudulent proceeds were used to fund the defendant bank accounts and to purchase other defendant assets as described above.

VERIFICATION OF SARAH ANDERSON
SPECIAL AGENT, FEDERAL BUREAU OF INVESTIGATION

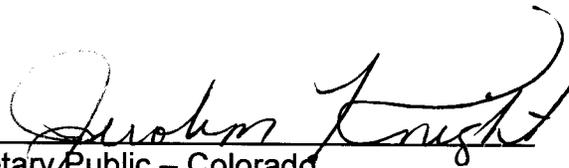
I, Sarah Anderson, hereby state and aver under the pains and penalties of perjury that I have read the foregoing Factual Basis for Forfeiture and that the facts and information contained therein are true.



Sarah Anderson
FBI-Special Agent

STATE OF COLORADO)
CITY AND) ss
COUNTY OF DENVER)

The foregoing was acknowledged before me this 4th day of December, 2017
by Sarah Anderson, Special Agent, Federal Bureau of Investigation.



Notary Public – Colorado
My Commission Expires:

JEROLYN KNIGHT
NOTARY PUBLIC
STATE OF COLORADO
NOTARY ID # 20104041608
MY COMMISSION EXPIRES OCTOBER 06, 2018

FIRST CLAIM FOR RELIEF

76. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

77. By the foregoing and other acts, defendant \$81,963.74 seized from defendant American First National Bank Account No. 1050809603 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 984.

SECOND CLAIM FOR RELIEF

78. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

79. By the foregoing and other acts, defendant \$81,963.74 seized from defendant American First National Bank Account No. 1050809603 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

THIRD CLAIM FOR RELIEF

80. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

81. By the foregoing and other acts, defendant funds held in Intrust Bank Account No. 99880485 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. 1343, and is, therefore, forfeitable pursuant to 18

U.S.C. § 981(a)(1)(C) and 984.

FOURTH CLAIM FOR RELIEF

82. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

83. By the foregoing and other acts, defendant Funds held in Intrust Bank Account No. 99880485 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

FIFTH CLAIM FOR RELIEF

84. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

85. By the foregoing and other acts, \$97,083.00 seized from defendant Hanmi Bank Account No. 1904739 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C) and 984

SIXTH CLAIM FOR RELIEF

86. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

87. By the foregoing and other acts, \$97,083.00 seized from defendant Hanmi Bank Account No. 1904739 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions

in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

SEVENTH CLAIM FOR RELIEF

88. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

89. By the foregoing and other acts, defendant \$30,000.00 seized from JP Morgan Chase Bank Account No. 3380658632 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 18 U.S.C. § 984.

EIGHTH CLAIM FOR RELIEF

90. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

91. By the foregoing and other acts, defendant \$30,000.00 seized from JP Morgan Chase Bank Account No. 3380658632 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

NINTH CLAIM FOR RELIEF

92. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

93. By the foregoing and other acts, defendant \$12,667.73 seized from defendant JP Morgan Chase Bank Account No. 810121009 constitutes or was derived

from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C) and 984.

TENTH CLAIM FOR RELIEF

94. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

95. By the foregoing and other acts, defendant \$12,667.73 seized from defendant JP Morgan Chase Bank Account No. 810121009 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

ELEVENTH CLAIM FOR RELIEF

96. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

97. By the foregoing and other acts, defendant \$12,992.91 seized from defendant Bank of America Account No. 435039808644 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. § 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. §§ 981(a)(1)(A) and (a)(1)(C) and 984.

TWELFTH CLAIM FOR RELIEF

98. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

99. By the foregoing and other acts, defendant \$12,992.91 seized from

defendant Bank of America Account No. 435039808644 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

THIRTEENTH CLAIM FOR RELIEF

100. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

101. By the foregoing and other acts, defendant \$1,827.00 seized from defendant PNC Bank Account No. 5346583816 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 984.

FOURTEENTH CLAIM FOR RELIEF

102. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

103. By the foregoing and other acts, defendant \$1,827.00 seized from defendant PNC Bank Account No. 5346583816 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

FIFTEENTH CLAIM FO RELIEF

104. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

105. By the foregoing and other acts, defendant \$50,000.00 seized from defendant Wells Fargo Bank Account No. 2000012034758 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 984.

SIXTEENTH CLAIM FOR RELIEF

106. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

107. By the foregoing and other acts, defendant \$50,000.00 seized from defendant Wells Fargo Bank Account No. 2000012034758 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

SEVENTEENTH CLAIM FOR RELIEF

108. The Plaintiff repeats and incorporates by reference each of the paragraphs above.

109. By the foregoing and other acts, defendant \$5,801.30 seized from defendant JP Morgan Chase Account 958694770 constitutes or was derived from proceeds traceable to violations of wire fraud in violation of 18 U.S.C. 1343, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(C) and 984.

EIGHTEENTH CLAIM FOR RELIEF

110. The Plaintiff repeats and incorporates by reference each of the

paragraphs above.

111. By the foregoing and other acts, defendant \$5,801.30 seized from defendant JP Morgan Chase Account 958694770 constitutes or was derived from proceeds traceable to violations of money laundering in violation of 18 U.S.C. § 1956, monetary transactions in property derived from specified unlawful activity in violation of 18 U.S.C. § 1957, and is, therefore, forfeitable pursuant to 18 U.S.C. § 981(a)(1)(A).

WHEREFORE, the United States prays for entry of a final order of forfeiture for the defendant assets in favor of the United States, that the United States be authorized to dispose of the defendant assets in accordance with law, and that the Court enter a finding of probable cause for the seizure of the defendant assets and issue a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465.

DATED this 4th day of December, 2017.

Respectfully submitted,

ROBERT C. TROYER
United States Attorney

By: s/Tonya S. Andrews

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