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UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA,

:

Plaintiff,

: Hon.

-v-

:

VERIFIED COMPLAINT FOR
FORFEITURE *IN REM*

\$1,742,289.43 IN UNITED STATES
CURRENCY PREVIOUSLY CONTAINED IN :
CITIBANK ACCOUNT NUMBER
4972753187 HELD IN THE NAME OF :

:

CELLULAR NEXT LLC,

:

Defendant *in rem*.

Plaintiff, United States of America, by its attorney, Paul J. Fishman,
United States Attorney for the District of New Jersey, by Evan Weitz, Assistant
United States Attorney, brings this complaint and alleges as follows in
accordance with Supplemental Rule G(2) of the Federal Rules of Civil
Procedure.

NATURE OF THE ACTION

1. This is a civil forfeiture *in rem* action to forfeit and condemn to the
use and benefit of the United States of America the following property:

\$1,742,289.43 in United States currency previously contained in Citibank account number 4972753187, held in the name of Cellular Next LLC (the “defendant property”), as property involved in violations of 18 U.S.C. §§ 1956 and/or 1957 and subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), and as funds traceable to the sale of narcotics and subject to forfeiture pursuant to 21 U.S.C. § 881.

THE DEFENDANT IN REM

2. The defendant property consists of \$1,742,289.43 in United States currency previously contained in Citibank account number 4972753187 held in the name of Cellular Next LLC. The defendant property is presently in the custody of the United States.

JURISDICTION AND VENUE

3. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, and over an action for forfeiture under 28 U.S.C. § 1355(a).

4. This Court has in rem jurisdiction over the defendant property under 28 U.S.C. § 1355(b)(1), because the acts or omissions giving rise to forfeiture occurred in the District of New Jersey. Upon the filing of this complaint, the plaintiff requests that the Clerk of the Court issue a Warrant for Arrest *In Rem* pursuant to Supplemental Rule G(3)(b)(i), which the plaintiff will

execute upon the defendant property pursuant to 28 U.S.C. § 1355(d) and Supplemental Rule G(3)(c).

5. Venue is proper in this district pursuant to 28 U.S.C. § 1355(b)(1) and 28 U.S.C. § 1395 because the defendant property is located in the District of New Jersey.

BASIS FOR FORFEITURE

6. The defendant property is subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A) as property involved in violations of 18 U.S.C. §§ 1956 and/or 1957 and is subject to forfeiture pursuant to 21 U.S.C. § 881 as funds traceable to the sale of narcotics.

STATUTORY BACKGROUND

7. Pursuant to 18 U.S.C. § 981(a)(1)(A), any property, real or personal, which is involved in a transaction or attempted transaction in violation of federal money laundering laws, 18 U.S.C. §§ 1956 or 1957, and any property traceable thereto, is subject to forfeiture to the United States.

8. Pursuant to 21 U.S.C. § 881, all property, real or personal, which constitutes or is derived from proceeds traceable to the sale of a controlled substance or was used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the sale of a controlled substance, is subject to forfeiture to the United States.

9. Pursuant to 18 U.S.C. § 984, in any forfeiture action in rem in which the subject property is cash or funds deposited in an account in a

financial institution, any identical property found in the same place or account as the property involved in the offense that is the basis for the forfeiture is subject to forfeiture.

MONEY LAUNDERING

10. Narcotics traffickers amass large cash proceeds from the sale of narcotics in the United States. Traffickers and their associates frequently attempt to give the impression of legitimacy to those proceeds; i.e., to "launder" them by making the proceeds appear to have been generated by a legitimate source. Traffickers must also devise various methods to remit those narcotics proceeds to suppliers of narcotics located in Colombia, Venezuela, and other South American countries, which are known source locations of narcotics, without alerting governmental or law enforcement agencies in either country.

11. In order to accomplish this goal, narcotics traffickers frequently utilize domestic and foreign banks and/or financial institutions in order both to make their narcotics profits appear to be from legitimate sources and to move those profits through the financial system into the countries where narcotics are produced.

12. A popular method to launder narcotics proceeds is for narcotics traffickers, through a third party, to "sell" their narcotics proceeds in the United States for pesos in South American countries. This practice, commonly known as the Black Market Peso Exchange (hereinafter "BMPE"), is centered on

a BMPE broker who can bring the drug dollars and the legitimate pesos together.

13. In a common BMPE scheme, a BMPE broker identifies a South American businessperson who imports goods, often electronics or other durable goods, from places such as the United States, China, or Panama. The BMPE broker offers the South American businessperson an opportunity to pay the debt owed to the exporter in the foreign country at a significant discount compared to making the payment through a South American bank. The South American businessperson who agrees to this scheme then turns over the payment for the imported goods in the form of pesos to the BMPE broker who in turn contacts a Drug Trafficking Organization (hereinafter "DTO"). When the BMPE broker contacts the DTO, the broker offers the pesos in South America in exchange for the narcotics proceeds which are located in the United States.

14. The BMPE broker then arranges to have the narcotics proceeds picked up by a member of the BMPE broker's organization. These money pickups usually occur between two people who have never met before and will most likely never meet again. These pickups frequently involve several hundred thousand dollars in narcotics proceeds.

15. Following the money pickup, the BMPE broker arranges to forward those funds to the exporter or retailer in the United States who has agreed to sell goods to the South American businessperson. This is frequently accomplished by either delivering the proceeds to the exporter or retailer, still

in the form of currency, or by depositing the currency into accounts held by the exporter or retailer. Frequently, these deposits are conducted by numerous individuals involved in the laundering process and not the business owners. Exporters or retailers who accept funds in this manner are a key part of the laundering process. Because many of these exporters and retailers operate cash-intensive businesses, the commingling of the narcotics proceeds with the proceeds of the business serves to conceal the illicit activity.

16. Notably, these deposits made directly into accounts held by exporters and retailers are usually made in different geographical locations, where the DTO is located, rather than transporting illicit dollars to the location where the exporter or retailer is located.

17. Once the narcotics proceeds are in accounts held by the exporter or retailer, they can be used to satisfy debts owed to the exporter or retailer from businesses in South America. The narcotics proceeds can also be deposited in a number of other bank accounts before ultimately being credited to the accounts held by the exporter or retailer in an effort to further obfuscate the source of the funds.

18. As discussed below, the BMPE broker may also arrange to smuggle the narcotics proceeds into other countries, where they can be more easily deposited into a financial institution. Once the funds are deposited into a foreign financial institution they can be wired to accounts held by the exporters in the United States or elsewhere. These funds may ultimately pass through

several foreign countries before being returned to the United States to be laundered. Generally, the process of laundering money this way costs the South American business person more than purchasing U.S. dollars which are given directly to the exporters. However, many individuals in South America are willing pay this extra fee to make the presence of narcotics proceeds harder to detect and because this method is requested by the exporter in the United States.

BANK SECRECY ACT

19. The Currency and Foreign Transactions Reporting Act, 31 U.S.C. § 5313 et seq., also known as the Bank Secrecy Act (hereinafter the “BSA”), was designed to combat money laundering and other crimes by, in part, imposing reporting requirements on most transactions involving more than \$10,000 in United States currency.

20. Specifically, under 31 U.S.C. § 5313(a) and its related regulations, when a domestic financial institution is involved in a transaction for the payment, receipt, or transfer of U.S. coins or currency (“cash”) in an amount greater than \$10,000, the institution is required to file a Currency Transaction Report (hereinafter “CTR”) for each cash transaction, such as, by way of example, a deposit, withdrawal, exchange of currency or other payment or transfer by, through or to a financial institution. CTR's are filed with the Financial Crimes Enforcement Network (hereinafter “FinCEN”) on forms that require, among other things, the identity of the individual who conducted the

transaction and the individual or organization for whom the transaction was completed.

21. Many individuals involved in illegal activities, such as narcotics trafficking and money laundering, are aware of the reporting requirements and take active steps to cause financial institutions to fail to file CTRs. These active steps include “structuring,” which involves making multiple cash deposits or withdrawals in amounts less than or equal to \$10,000, but which in the aggregate exceed \$10,000, to multiple banks and/or branches of the same bank.

22. The BSA also provides for additional safeguards against the BMPE and similar money laundering schemes. For instance, the BSA requires all domestic financial institutions to file Suspicious Activity Reports (hereinafter “SARs”) with FinCEN whenever they identify potentially suspicious activity on the part of their customers. Domestic financial institutions must also maintain or “Know Your Customer” (hereinafter “KYC”) programs to ensure that their customers are utilizing the financial institutions only for legitimate uses. Domestic financial institutions frequently utilize anti-money laundering software and take additional measures to ensure that they are not servicing individuals engaged in illicit activity. These examples represent just a few steps that domestic financial institutions take to remain compliant with the BSA and to combat money laundering.

23. Finally, pursuant to 31 U.S.C. § 5331 and related regulations, any trade or business that receives more than \$10,000 in one or more related transactions is required to collect personal identifying information of the customer, and must file that information on a form commonly referred to as “form 8300,” which is either filed on paper with the Internal Revenue Service (hereinafter “IRS”) or filed electronically with FinCEN. Businesses that structure funds into their bank accounts, or otherwise accept illicit cash payments, frequently fail to file form 8300s in an attempt to further hide their cash activity and to afford anonymity to customers dealing in narcotics dollars.

USE OF FOREIGN WIRE TRANSFERS IN THE BMPE PROCESS

24. As discussed above, very often the first step involved in money laundering activities is the placement of narcotics proceeds into the financial system for transporting and laundering purposes. While the placement of narcotics proceeds into domestic banks is still a popular method for introducing illicit currency into the financial system, due to increased vigilance on the part of domestic financial institutions and enforcement of the BSA, it has become increasingly difficult for individuals to place illicit currency into bank accounts in the United States while avoiding detection by law enforcement.

25. As a result, there has been a significant rise in the amount of bulk United States currency smuggled out of the United States. Once that currency is out of the United States, it is deposited into foreign financial institutions,

which may be more lenient in their reporting requirements and reporting of suspicious activity to governmental authorities. Once the currency is in a foreign financial system, it can be wire transferred virtually anywhere in the world, including back to the United States, where it can be used as payment for goods to be sent to South America as part of the BMPE.

26. Additionally, law enforcement has traditionally conducted undercover “pickup” operations wherein narcotics dealers provide narcotics proceeds to undercover law enforcement agents with the belief that those proceeds will be laundered by peso brokers as part of the BMPE. Many of these pickups were conducted in the clandestine manner described above and were then structured into accounts held by exporters in the United States.

27. However, from these undercover “pickup” operations it appears that exporters are increasingly wary of receiving currency deposits structured into their bank accounts, presumably because they have become aware that both law enforcement and financial institutions are increasingly vigilant about currency structuring. Instead, many of these exporters have turned to receiving wire transfers from foreign countries where U.S. currency was smuggled into and deposited into financial institutions as discussed above. Notably, this frequently results in the exporter receiving wire transfers from countries such as Mexico and Panama for the benefit of customers frequently located in other countries such as Colombia.

FACTS

28. Cellular Next, LLC (hereinafter "CN") is a business incorporated in the state of New York. According to bank records, CN operates a cellular phone wholesale company out of both New York and Miami, Florida, and is registered as a business entity with the New Jersey Department of Treasury, Division of Revenue & Enterprise Services.

CN'S HISTORY OF RECEIVING NARCOTICS PROCEEDS

29. CN has received narcotics proceeds as part of the BMPE on numerous occasions in the past. As described below, on several occasions law enforcement officers working for the U.S. Drug Enforcement Administration (hereinafter "DEA"), acting in an undercover capacity, have sent wire transfers of narcotics proceeds to CN at the direction of BMPE brokers based in Colombia.

30. On April 1, 2011, DEA agents delivered \$12,000 in currency to CN's retail store in Florida at the direction of a BMPE broker after receiving the funds from a narcotics dealer. The store manager, Bilial Munir (hereinafter "Munir"), and a sales associate, Olga Barba (hereinafter "Barba"), received the narcotics proceeds from the undercover agent and did not ask for any identification that would make it possible to file a form 8300.

31. On July 7, 2011, DEA agents in Atlanta, Georgia, conducted a covert pickup of \$174,330 of narcotics proceeds. On July 11, 2011, at the direction of a BMPE broker, DEA agents sent a wire transfer of \$8,736 to an

HSBC bank account held by CN. On May 30, 2012, the DEA seized \$8,736 from CN's HSBC account based on this transaction.

32. On April 20, 2012, DEA agents in New York conducted a covert pickup of \$399,980 of narcotics proceeds in Queens. On April 30, 2012, at the direction of a BMPE broker, the DEA sent a portion of those proceeds, \$19,800, to CN's HSBC account by wire transfer.

33. On April 23, 2012, DEA agents in Miami followed a money laundering suspect, Diana Marcella Castenda (hereinafter "Castenda") to CN's retail location in Doral, Florida. Upon exiting the store Castenda was stopped and subsequently admitted to "dropping" \$10,000 to CN. No receipt was given for the transaction and the cash was delivered in white plastic bags. Castenda further explained that she was instructed to meet an unknown individual who would give her a sum of money which she was to take to CN. Castenda further admitted to having previously taken an additional \$10,000 to CN. It is believed that Castenda was involved in a money pickup of narcotics proceeds as described above.

34. DEA agents also interviewed all the employees present during the time of the April 23, 2012 transaction with Castenda. Despite Castenda's admission that she had previously been to the location with \$10,000, Manager Munir stated he did not know Castenda and this was the first time she came to the retail location. Munir also stated that the parent company in New York told him not to receive more than \$10,000 cash at any one time because the

company would have to file paperwork. When asked to produce all form 8300's filed by CM, Munir stated they did not file 8300's because they did not accept over \$10,000 in cash at one time. However, as discussed above, CN had received \$12,000 in currency from an undercover officer on April 1, 2011.

35. On March 11, 2013, DEA agents in New York conducted a covert pickup of \$254,975 of narcotics proceeds in Queens, New York. On March 13, 2013, at the direction of a BMPE broker, DEA agents in New York sent wire transfers of \$52,326 and \$35,000 to Citibank account number 4972753187 held by CN (hereinafter the "seized account").

CN'S HISTORY OF RECEIVING STRUCTURED DEPOSITS

36. In addition to the instances described above in which CN received narcotics proceeds, CN has a history of having its bank accounts closed by financial institutions for structuring. CN had accounts closed by HSBC, TD Bank, and Capital One for misuse. A review of bank account activity for some of those closed accounts reveals evidence of large numbers of structured cash deposits from at least 2010 through 2013. Specifically, there are numerous cash deposits made on the same day or over a short span of time that together exceed \$10,000.01, the amount of money that would have triggered the filing of a CTR, without a single deposit over \$10,000.

37. In 2011, the United States executed a seizure warrant against an account held in the name of SEG Electronics based upon allegations that the account was receiving structured cash deposits as part of the BMPE. Bank

records show that SEG Electronics had been purchasing large amounts of goods from CN. During this same time period, the structured cash deposits into the seized account stopped (although, as discussed above, structured cash deposits continued until at least 2013 into other accounts held by CN).

38. It is believed that the seizure of the SEG Electronics account, coupled with the closing of multiple accounts held by CN, caused CN to stop accepting structured cash deposits into the seized account. Rather, it is believed that sometime in 2011 or 2012, CN began accepting payments only in the form of wire transfers, checks, or bulk cash deposits made by employees of CN after receiving the cash from customers. However, despite the deposit of large amounts of cash by CN employees, CN has never filed a form 8300. It is believed that CN failed to file forms 8300 in an attempt to protect the identity of its customers from the United States.

39. Bank records also reveal that the seized account has received funds traceable to structured cash deposits. Specifically, approximately \$65,308 was structured into accounts held by Lenis Paz ("Lenis Paz") and Carlos Parra ("Parra"), both of whom reside in Colombia. These structured deposits were made in multiple locations across the United States, including locations within the District of New Jersey. Examples of that structuring activity include the following:

Carlos Parra
Wells Fargo account ending in 5380

<u>Date</u>	<u>Amount</u>	<u>Locations</u>
04/24/12	4,000.00	Elizabeth, NJ
04/24/12	5,000.00	Linden, NJ
05/10/12	9,500.00	Elizabeth, NJ

Alvaro Lenis Paz
Wells Fargo account ending in 0887

<u>Date</u>	<u>Amount</u>	<u>Locations</u>
01/11/12	5,000.00	Atlanta, GA
01/13/12	4,000.00	New York, NY
01/18/12	4,454.00	Bronx, NY
01/18/12	5,546.00	Hewlett, NY
01/18/12	3,000.00	Van Nuys, CA
01/24/12	10,000.00	Los Angeles, CA
01/25/12	10,000.00	Pasadena, CA
02/09/12	1,000.00	Manhasset, NY
02/14/12	9,301.00	Elizabeth, NJ
02/15/12	2,000.00	Evanston, IL
03/09/12	449.00	Coral Gables, FL
04/23/12	1,293.00	Niles, IL
04/24/12	1,329.00	Katy, TX
04/30/12	3,300.00	Manhasset, NY

40. Bank records demonstrate that checks drawn from the accounts held by Parra and Lenis Paz were then written to an individual named Daniel Otero (hereinafter "Otero") and to Barba, an employee of CN discussed above. Bank records also demonstrate that Otero and Barba then cashed those checks and it is believed that cash was then delivered to CN for the benefit of a company in Colombia named Distribuciones Mi Pueblito (DMP). This activity is consistent with the use of the BMPE to launder narcotics proceeds.

41. Record checks with a freight forwarder used by CN to ship goods to DMP have listed Parra, Barba and Daniel Otero as being affiliated with DMP.

CN'S HISTORY OF RECEIVING ILLICIT WIRE TRANSFERS

42. From September 2012 through May 2013, the seized account received 356 wire transfers totaling \$60,189,522 and 86 cash deposits totaling \$2,026,133. During the same time, CN generated a total of 69 Shipper's Export Declarations (SEDs) totaling \$13,695,479. SEDs are required to be filed with the Department of Homeland Security detailing the contents and recipients of all goods imported or exported through the United States. Of the 69 SEDs, there are 44 SEDs where a customer appears both on the bank statement of CN as sending a wire transfer for goods and on a SED as the ultimate consignee of the goods. These transactions appear consistent with the normal course of business.

43. However, 20 of the 69 SEDs do not have any corresponding wire transfers or checks with the entity listed as the ultimate consignee. All 20 of these SEDs were for DMP. Record checks conducted through the Federal Reserve confirm that no wire transfers were sent by DMP to CN during that time period. Additionally, record checks reveal no 8300's filed by CN during this same time period. The value of the goods shipped to DMP, as indicated on the SEDs, was \$1,745,936. Notably, this was less than the approximate \$2,000,000 in cash deposited into the seized account during this time. It is apparent that DMP paid for the goods in cash, and that cash was deposited into the seized account.

THE SEIZURE OF THE DEFENDANT PROPERTY

44. On February 25, 2014, a seizure warrant was issued by the Honorable Joseph A. Dickson, United States Magistrate Judge for the District of New Jersey, for a sum of funds not to exceed \$1,745,936 held at Citibank account number 4972753187 in the name of Cellular Next LLC.

45. On February 25, 2014, agents of the United States Department of Homeland Security executed the above referenced seizure warrants resulting in the seizure of the defendant property. Specifically, the execution of the above-referenced seizure warrants resulted in the seizure of \$1,742,289.43 from Citibank account number 4972753187, held in the name of Cellular Next LLC.

46. On March 4, 2014, agents of the Department of Homeland Security interviewed Ali Mushtaq, an employee of CN. Ali Mushtaq described the business as a cell phone distributor, primarily selling brands such as Samsung and Huawei.

47. When asked about DMP, Ali Mushtaq stated that the sales representatives in Florida might know about DMP and that he thought that DMP was a Colombian client. He further stated that most business from Colombia was paid by wire and some by local payor.

48. Also on March 4, 2014, agents of the Department of Homeland Security interviewed Barba. Barba said she was a Sales Manager for Cellular Next with a concentration on Latin America.

49. When asked about DMP Barba recognized the name but stated she had not done business with them since around 2011. When shown an SED which indicated that she was the contact person for exports from CN in Miami to DMP in Colombia she stated that she did not know how the freight forwarder got the name DMP and that it was not from her.

50. When shown SEDs that linked her, Cellular Next, Parra and Daniel Otero (hereinafter "Otero") to DMP she identified Parra and Otero as linked to other businesses.

51. Barba stated that Parra represents Latin Solutions (hereinafter "LS"). She stated that although Parra was in Colombia, LS now has a US address in Miami.

52. Barba stated that Otero was from Colombia and that his business was called Mi Casillero Virtual.

53. Barba was asked about cash deposits into her personal account from Lenis Paz, Parra, and Otero. Barba initially stated that she did not remember anything from Lenis Paz but, after she was pressed, she said she might have gotten a deposit from him once in 2012, but she did not recall the amount. She then said that she may have received, at the most, three (approximately \$5,000) deposits from Parra, which were for "phones." Barba said she could not remember getting any deposits from Otero.

54. Barba was eventually instructed that investigators had reviewed her bank records. She then admitted that she was asked by Parra and Otero to

do “favors” and receive some cash deposits into her personal checking account. She said that Parra and Otero would place an order with CN for “say” \$60,000. They would send \$55,000 by wire or check to Cellular Next and tell Barba that they didn’t have enough money in their business account, but that they were willing to place a cash deposit for the difference, in this instance \$5,000, in Barba’s personal account, with which she could then pay CN. Barba said that Parra and Otero’s wires or checks came from “legitimate” banks in Colombia.

55. When asked why they didn’t pay CN directly, she said that CN’s policy was not to accept checks from personal accounts. When asked how she then paid the difference (\$5,000) to CN, Barba said that each and every time she would take the cash from her personal account and give the cash to Ibrahim Khali, who worked at CN in Doral, Florida and was the uncle of another CN employee, Umar Mushtaq.

56. Barba further stated that she had done these types of transactions since 2012 and that she believed that the total amount of cash received from Parra was approximately \$30,000 in 2013 and about the same or less for 2012. She said she couldn’t remember how much she received from Lenis Paz or Otero.

57. Barba stated that she recognized, acknowledged, and understood that the cash transactions she passed through her personal account could be narcotics proceeds. Barba also stated that there was an inherent danger in accepting these types of transactions. She further noted that in 2012, when

DEA seized money from CN, some of her Latin American customers asked her if she was cooperating and working for the DEA.

58. Barba was questioned regarding CN's policies of accepting structured cash deposits into their bank account. She stated that CN stopped receiving cash payments in that fashion that after DEA made their last seizure in 2012.

59. Barba was once again asked about her dealings with DMP. She continued to say that she had not done business with them since 2011. Barba was shown an SED which referenced recent sales to DNP from CN with Barba listed as the salesperson, dating well into 2013. Barba still said she could not remember doing any recent business with DNP.

60. On March 4, 2014, agents of the Department of Homeland Security also interviewed Umar Mushtaq, an employee of CN.

61. Umar Mushtaq was told that agents were there to question Barba regarding her dealings with DMP. Umar Mushtaq was unfamiliar with the company but volunteered to look them up on his corporate laptop computer which he retrieved from his office. After several attempts Umar Mushtaq was unable to retrieve any transactions with DMP, even though he was provided with several transaction dates and billing amounts. Umar Mushtaq said that his brother Ali Mushtaq was better at the computer and said he would call him and let him look up DMP transactions. However, Umar also stated that he was

unable to retrieve the transactions in question or find anything with relation to DMP.

62. Umar Mushtaq was queried about cash transactions and he stated that it was not uncommon on, say, a typical \$25,000 order, for the customer to deposit \$4K in cash into their account and pay the rest in a wire transfer.

CLAIM FOR FORFEITURE

63. The allegations contained in paragraphs 1 through 62 of this Verified Complaint are incorporated herein and made part hereof.

64. The defendant property was involved in violations of 18 U.S.C. §§ 1956 and/or 1957 and constitutes funds traceable to the sale of narcotics.

65. As a result of the foregoing, the defendant property and all proceeds traceable thereto are subject to condemnation and to forfeiture to the United States for its use, pursuant to 18 U.S.C. § 981(a)(1)(A) and 21 U.S.C. § 881.

WHEREFORE, plaintiff requests that the Clerk of the Court issue a warrant for the arrest in rem and seizure of the defendant property; that notice of this action be given to all persons who reasonably appear to be potential claimants to the defendant property; that the defendant property be forfeited and condemned to the United States of America; that plaintiff be awarded

its costs and disbursements in this action; and that the Court award such other and further relief as it deems proper and just.

PAUL J. FISHMAN
United States Attorney



By: EVAN S. WEITZ
Assistant United States Attorney

Dated: June 18^B, 2014
Newark, New Jersey

VERIFICATION

STATE OF NEW JERSEY :
ss
COUNTY OF ESSEX :

I, Michael Kearns, hereby verify and declare under penalty of perjury that I am a Special Agent with the Department of Homeland Security, Homeland Security Investigations, that I have read the foregoing Verified Complaint for Forfeiture *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.


The sources of my information and the grounds of my belief include the official files and records of the United States, information supplied to me by other law enforcement officers, and my own investigation of this case.

I hereby verify and declare under penalty of perjury that the foregoing is true and correct.



MICHAEL KEARNS
Special Agent
Department of Homeland Security
Homeland Security Investigations

Sworn to and subscribed before me this 15th
day of June, 2014, at Newark, New Jersey.



EVAN S. WEITZ, ESQ.
Attorney-at-Law of the State of New Jersey