

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR POSSESSION OF FIFTEEN OR MORE OF COUNTERFEIT OR UNAUTHORIZED DEVICES

UNITED STATES OF AMERICA

CRIMINAL DOCKET NO.

SECTION:

JAN BREWER a/k/a CHAD STEWART a/k/a LARRY HARTFORD

v.

VIOLATION:18 U.S.C. § 1029(a)(3)

The Grand Jury charges that:

COUNT 1

On or about October 17, 2011, in the Eastern District of Louisiana and elsewhere, defendant, JAN BREWER, a/k/a CHAD STEWART, a/k/a LARRY HARTFORD, knowingly and with intent to defraud, possessed fifteen or more counterfeit access devices, to wit, 25 counterfeit credit cards encoded with the unauthorized financial account information of another person, which affected interstate commerce;

All in violation of Title 18, United States Code, Section 1029(a)(3).

NOTICE OF FORFEITURE

- 1. The allegations of Count 1 of this Indictment are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 1029(a)(3).
- 2. As a result of the offense alleged in Count 1 the defendant, **JAN BREWER**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 1029(a)(3).
- 3. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:
 - a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third person;
 - 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 subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property. All in violation of Title 18, United States Code, Section 1029(a)(3).

A TRUE BILL:

FOREMAN

JIM LETTEN

United States Attorney LA/Bar Roll No. 8715

JAN MASELLI MANN

First Assistant United States Attorney

LA Bar Roll No. 9020

SPIRO G. LATSIS

Assistant United States Attorney

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New Orleans, Louisiana October 28, 2011