

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

INDICTMENT FOR  
IMPORTATION OF COUNTERFEIT UNITED STATES CURRENCY

UNITED STATES OF AMERICA

\*

CRIMINAL DOCKET NO.

v.

\*

SECTION:

DAVID BAKARE

\*

VIOLATIONS: 18 U.S.C. § 472  
18 U.S.C. § 2

a/k/a Badmus Bakey

\*

\* \* \*

The Grand Jury charges that:

COUNT 1

On or about February 14, 2012, in the Eastern District of Louisiana and elsewhere, the defendant, **DAVID BAKARE, a/k/a Badmus Bakey**, with intent to defraud, did conceal and bring into the United States, falsely made, forged and counterfeited obligations of the United States, to wit: approximately \$5,000.00 in counterfeit United States currency, which he then knew to be falsely made, forged and counterfeited; all in violation of Title 18, United States Code, Sections 472 and 2.

## NOTICE OF FORFEITURE

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 492 and Title 28, United States Code, Section 2461(c).

2. Upon conviction of an offense in violation of 18 U.S.C. § 472 set forth in Count 1 of this Indictment, the defendant, **DAVID BAKARE, a/k/a Badmus Bakey**, shall forfeit to the United States pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c) all counterfeits of any coins or obligations or other securities of the United States or of any foreign government; any articles, devices, and other things made, possessed, or used in violation of 18 U.S.C. § 472; and any material or apparatus used or fitted, or intended to be used, in the making of such counterfeits, articles, devices, or things, found in the possession of the defendant without proper authority.

3. If any of the property described above, as a result of any act or omission of the defendant(s):

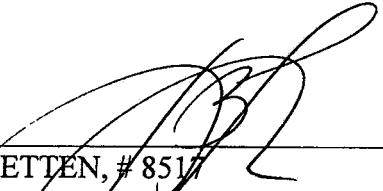
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or


(e) has been commingled with other property which cannot be divided without difficulty; the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), incorporated by 28 U.S.C. § 2461(c).

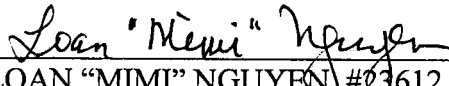
All pursuant to 18 U.S.C. § 492 and 28 U.S.C. § 2461(c).


A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

  
\_\_\_\_\_  
JIM LETTEN, # 8517  
United States Attorney

  
\_\_\_\_\_  
JAN MASELLI MANN, # 9020  
First Assistant U.S. Attorney

  
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LOAN "MIMI" NGUYEN, #23612  
Assistant United States Attorney

  
\_\_\_\_\_  
ROBERT WEIR, MS # 101464  
Special Assistant U.S. Attorney

New Orleans, Louisiana  
July 20, 2012