

**FILED**

**AUG 20 2024**

**CLERK U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF IOWA**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF IOWA**

UNITED STATES OF AMERICA, )  
 )  
 v. )  
 )  
 THADDEUS JEROME LEE, )  
 also known as Kyle Keessen, )  
 and Big Grind, )  
 JOHNNIE LEE THOMAS, )  
 also known as Yola, )  
 MALIK K. MARSHALL, )  
 also known as Thang, and )  
 M Thang, )  
 LATROY L. CURRIE, )  
 also known as Mook, )  
 TIARRA LENA E JONES, )  
 also known as Queen, )  
 STEPHAN RASHAD HALEY, )  
 also known as Ace, and Bosh, )  
 LOVELY HALL, )  
 KIRA ASHLEIGH JOHNSON, )  
 also known as Dior, )  
 CARNELL A. THOMAS, JR., )  
 REANNA R. HAYMON, )  
 SOMORE RENEE HILL, )  
 SHAPARA MONEE HUNTER, )  
 TONI LYNETTE RENFROE, )  
 ERIN R. SMITH, )  
 MARIO RICARDO SMITH, )  
 JAZLINN CHAUTE TAPP, )  
 JOHN IVORY WINSTON, JR., and )  
 KILA R. WRIGHT, )  
 )

Criminal No. 4:24-cr-108

INDICTMENT

- T. 18 U.S.C. § 2
- T. 18 U.S.C. § 982(a)(1)
- T. 18 U.S.C. § 1344(1)
- T. 18 U.S.C. § 1344(2)
- T. 18 U.S.C. § 1349
- T. 18 U.S.C. § 1956(h)
- T. 18 U.S.C. § 1957
- T. 21 U.S.C. § 853(p)
- T. 28 U.S.C. § 2461(c)

Defendants.

**THE GRAND JURY CHARGES:**

**INTRODUCTION TO ALL COUNTS**

At all times relevant to this Indictment:

**Defendants and Related Entities**

1. Defendants THADDEUS JEROME LEE, also known as Kyle Keessen and Big Grind, JOHNNIE LEE THOMAS, also known as Yola (J. THOMAS), and TIARRA LENA E JONES, also known as Queen, lived in Arizona. Most of the other Defendants lived in Iowa, Illinois, or Indiana.

2. The Lees Transportation LLC is an Arizona limited liability company, formed in or about October 2022. Defendant LEE was the organizer of the company, and he remains the member and manager of the company.

3. TBTKC LLC is an Arizona limited liability company, formed in or about October 2022. Defendant J. THOMAS was the organizer of the company, and he remains the member and manager of the company.

4. MM Transportation, LLC is an Arizona limited liability company, formed in or about October 2022. Defendant LATROY L. CURRIE, also known as Mook, was the organizer of the company, and he remains the member and manager of the company.

5. Queen's Clothing's LLC is an Arizona limited liability company, formed in or about May 2023. Defendant JONES was the organizer of the company, and she remains the member and manager of the company.

6. NNL LLC is an Iowa limited liability company, formed in or about April 2023. Defendant LOVELY HALL was the organizer of the company, and she is the sole member of the company.

### **The Business Victims**

7. The business victims of mail theft and other criminal activities described in this Indictment (the Business Victims) include, but are not limited to, the companies with the following initials: S.C., A.E., T.S., C.C., N.C., B.C.C., C.T.O.S., B.O., W.E., C.G., R.M., and Y.A.

8. The Business Victims were postal customers who did business in the United States and Canada, including, but not limited to, in the states of Georgia, Illinois, Ohio, Texas, California, New York, Alabama, and Idaho and the province of Quebec. The Business Victims had checks on which they were either (a) the issuing party, or (b) the intended recipient, stolen from the United States mails. As part of the criminal activities described in this Indictment, unauthorized accounts were opened at financial institutions in the names of Business Victims or in substantially similar names.

### **The Financial Institutions that Defendants and Uncharged Co-Conspirators Used to Perpetrate Their Crimes and the Financial Institution Victims**

9. To complete the conspiracies and scheme to defraud described herein, Defendants and uncharged co-conspirators utilized services at various financial institutions, including, but not limited to, the financial institutions described in the following paragraphs.

10. The following were financial institutions that did business in the State of Iowa and that had accounts which were insured by the Federal Deposit Insurance Corporation:

- a. Bank of America, National Association (Bank of America);
- b. BMO Bank, National Association (BMO Bank);
- c. First Central State Bank;
- d. Great Southern Bank;
- e. JPMorgan Chase Bank, National Association (JPMorgan Chase);
- f. PNC Bank, National Association (PNC Bank); and
- g. U.S. Bank, National Association (U.S. Bank).

11. The following were financial institutions that did business in the State of Iowa and that had accounts which were insured by the National Credit Union Administration:

- a. Ascentra Credit Union;
- b. Collins Community Credit Union;
- c. Community Choice Credit Union;
- d. Financial Plus Credit Union;
- e. Greater Iowa Credit Union;
- f. GreenState Credit Union; and
- g. Veridian Credit Union.

12. The financial institution victims of fraud and other criminal activities described in this Indictment (the Financial Institution Victims) include, but are not

limited to, Ascentra Credit Union, Collins Community Credit Union, Community Choice Credit Union, Financial Plus Credit Union, First Central State Bank, Great Southern Bank, GreenState Credit Union, and Veridian Credit Union.

13. Defendants and uncharged co-conspirators conspired to defraud the Financial Institution Victims, and participated in and executed (and attempted to execute) a scheme to defraud the Financial Institution Victims, by, among other things, (a) opening (and attempting to open) unauthorized and fraudulent accounts at Financial Institution Victims' locations in the names of Business Victims or in substantially similar names, and (b) depositing (and attempting to deposit) into those accounts checks for which Business Victims were either the issuing party or the intended recipient.

#### **Employer Identification Numbers and Official Checks**

14. As part of the conspiracies and scheme to defraud described in this Indictment, Defendants and uncharged co-conspirators obtained Employer Identification Numbers (EINs) from the Internal Revenue Service (IRS) for fraudulent business entities. An EIN is a nine-digit number assigned by the IRS for tax filing and reporting purposes to employers, including, but not limited to, corporations, limited liability companies, and other entities. To obtain an EIN, business entities file with the IRS a Form SS-4, entitled "Application for Employer Identification Number." Business entities may file Forms SS-4 via IRS's internet portal.

15. As used in this Indictment, the phrase “official check” includes a cashier’s check, teller’s check, treasurer’s check, bank check, certified check, member check, or any other monetary instrument issued by a financial institution which serves as a guarantee of funds on behalf of the party which purchased or obtained the instrument from the issuing financial institution.

**COUNT 1**  
**(Conspiracy to Commit Bank Fraud)**

16. Paragraphs 1 through 15 of this Indictment are realleged and incorporated as if set forth fully herein.

17. From a date unknown, but by no later than in or about December 2021, and continuing to a date unknown, but until at least in or about May 2024, in the Southern District of Iowa and elsewhere, the defendants, THADDEUS JEROME LEE, also known as Kyle Keessen and Big Grind, JOHNNIE LEE THOMAS, also known as Yola (J. THOMAS), MALIK K. MARSHALL, also known as Thang and M Thang, LATROY L. CURRIE, also known as Mook, TIARRA LENA E JONES, also known as Queen, STEPHAN RASHAD HALEY, also known as Ace and Bosh, LOVELY HALL, KIRA ASHLEIGH JOHNSON, also known as Dior, CARNELL A. THOMAS, JR. (C. THOMAS), REANNA R. HAYMON, SOMORE RENEE HILL, SHAPARA MONEE HUNTER, TONI LYNETTE RENFROE, ERIN R. SMITH (E. SMITH), MARIO RICARDO SMITH (M. SMITH), JAZLINN CHAUTE TAPP, and JOHN IVORY WINSTON, JR., did knowingly and willfully combine, conspire, confederate, and agree with each other, and with others known and unknown to the grand jury, to commit Bank Fraud, in violation of Title 18, United States Code.

Section 1344, that is, to execute and attempt to execute a scheme and artifice to defraud federally insured financial institutions, and to obtain and attempt to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of federally insured financial institutions by means of materially false and fraudulent pretenses, representations, and promises, and by the concealment of material facts.

### **Object of the Conspiracy and the Scheme to Defraud**

18. It was the purpose and object of the conspiracy and scheme to defraud federally insured financial institutions to negotiate stolen business checks into fraudulent accounts established by Defendants and their uncharged co-conspirators, thus giving Defendants and their uncharged co-conspirators access to funds to which they were not entitled.

### **Manner and Means**

19. The manner and means by which the foregoing object of the conspiracy to commit bank fraud was accomplished included, but was not limited to, the following:

- a. Uncharged co-conspirators stole mail matter which contained legitimate business checks written to and intended to be received by legitimate companies, including, but not limited to, the Business Victims; Defendants then obtained those stolen business checks from uncharged co-conspirators.
- b. Defendants and their uncharged co-conspirators registered sham entities with state government agencies, including, but not limited to, the Iowa Secretary of State; such sham entities had names which were identical or substantially similar to the legitimate businesses who were the intended recipients of the stolen checks.

- c. Defendants and their uncharged co-conspirators applied for and received from the IRS EINs for the sham entities.
- d. Defendants and their uncharged co-conspirators recruited others to open and attempt to open accounts at federally insured financial institutions in the names of the sham entities, supplying the individuals they recruited with the stolen business checks and documentation obtained for the sham entities from state government agencies and the IRS.
- e. Using the registration documents and EINs obtained on behalf of the sham entities, Defendants and their uncharged co-conspirators opened and attempted to open accounts at federally insured financial institutions, including, but not limited to, the Financial Institution Victims, in the names of the sham entities with the intent that those accounts would be used for the deposit of stolen checks; to do so, Defendants and their uncharged co-conspirators made materially false and fraudulent representations to the financial institutions and actively concealed material facts from the financial institutions.
- f. When Defendants and their uncharged co-conspirators opened and attempted to open accounts at federally insured financial institutions for the sham entities, or after said accounts had been opened, Defendants and their uncharged co-conspirators deposited, or attempted to deposit, the stolen business checks into the accounts; the Defendants did so with the intent of giving themselves and their uncharged co-conspirators access to funds to which they were not entitled.

20. Through these manners and means, Defendants and their uncharged co-conspirators attempted to negotiate stolen business checks into fraudulent accounts at federally insured financial institutions which, in total, exceeded \$10 million in value.

All in violation of Title 18, United States Code, Section 1349.



**THE GRAND JURY FURTHER CHARGES:****COUNTS 2-13**  
**(Bank Fraud)**

21. Paragraphs 1 through 20 of this Indictment are realleged and incorporated as if set forth fully herein.

22. On or about the dates set forth below, in the Southern District of Iowa and elsewhere, the specified defendant did knowingly and willfully execute and attempt to execute a scheme and artifice to defraud federally insured financial institutions, namely, the scheme and artifice described in Count 1 of this Indictment, and to obtain and attempt to obtain moneys, funds, credits, assets, securities, and other property owned by and under the custody and control of federally insured financial institutions by means of materially false and fraudulent pretenses, representations, and promises, and by the concealment of material facts, as described in Count 1 of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Financial Institution</b>	<b>Description of Execution (or Attempted Execution)</b>
2	10/25/2022 to 10/27/2022	M. SMITH	Veridian Credit Union	Opening of business account(s) in the name of the sham entity S.C. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$58,206.41) written to Business Victim S.C.

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Financial Institution</b>	<b>Description of Execution (or Attempted Execution)</b>
3	03/22/2023 to 03/23/2023	HUNTER	Ascentra Credit Union	Opening of business account(s) in the name of the sham entity A.E. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$82,865.72) written to Business Victim A.E.
4	03/28/2023 to 03/29/2023	HALL	GreenState Credit Union	Opening of business account(s) in the name of the sham entity T.S. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$118,252) written to Business Victim T.S.
5	04/19/2023 to 04/21/2023	HILL	GreenState Credit Union	Opening of business account(s) in the name of the sham entity C.C. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$65,308.88) written to Business Victim C.C.
6	05/15/2023 to 05/16/2023	E. SMITH	GreenState Credit Union	Opening of business account(s) in the name of the sham entity N.C. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$94,096.95) written to Business Victim N.C.

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Financial Institution</b>	<b>Description of Execution (or Attempted Execution)</b>
7	05/16/2023	C. THOMAS	Great Southern Bank	Opening of business account(s) in the name of the sham entity B.C.C. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$156,017) written to Business Victim B.C.C.
8	05/25/2023	HAYMON	First Central State Bank	Opening of business account(s) in the name of the sham entity C.T.O.S. and presenting for deposit into said account(s) a stolen business check (in the amount of \$78,602.17) written to Business Victim C.T.O.S.
9	06/15/2023 to 06/20/2023	C. THOMAS	Collins Community Credit Union	Opening of business account(s) in the name of the sham entity B.O. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$53,277.44) written to Business Victim B.O.
10	07/18/2023 to 07/19/2023	RENFROE	Community Choice Credit Union	Opening of business account(s) in the name of the sham entity W.E. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$287,986.51) written to Business Victim W.E.

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Financial Institution</b>	<b>Description of Execution (or Attempted Execution)</b>
11	07/20/2023 to 07/21/2023	TAPP	Financial Plus Credit Union	Opening of business account(s) in the name of the sham entity C.G. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$93,574.99) written to Business Victim C.G.
12	08/10/2023 to 08/17/2023	C. THOMAS	Veridian Credit Union	Opening of business account(s) in the name of the sham entity R.M. and then causing to be deposited into said account(s) a stolen business check (in the amount of \$68,800) written to Business Victim R.M.
13	08/21/2023	WINSTON	Great Southern Bank	Opening of business account(s) in the name of the sham entity Y.A. and presenting for deposit into said account(s) a stolen business check (in the amount of \$479,786.63) written to Business Victim Y.A.

Each of the above counts is a violation of Title 18, United States Code, Section 1344(1) and (2).

**THE GRAND JURY FURTHER CHARGES:**

**COUNT 14**  
**(Conspiracy to Commit Money Laundering)**

23. Paragraphs 1 through 22 of this Indictment are realleged and incorporated as if set forth fully herein.

24. From a date unknown, but no later than in or about December 2021, and continuing to a date unknown, but until at least in or about May 2024, in the Southern District of Iowa and elsewhere, the defendants, THADDEUS JEROME LEE, also known as Kyle Keessen and Big Grind, JOHNNIE LEE THOMAS, also known as Yola (J. THOMAS), MALIK K. MARSHALL, also known as Thang and M Thang, LATROY L. CURRIE, also known as Mook, TIARRA LENAE JONES, also known as Queen, STEPHAN RASHAD HALEY, also known as Ace and Bosh, LOVELY HALL, KIRA ASHLEIGH JOHNSON, also known as Dior, CARNELL A. THOMAS, JR. (C. THOMAS), REANNA R. HAYMON, SOMORE RENEE HILL, SHAPARA MONEE HUNTER, TONI LYNETTE RENFROE, ERIN R. SMITH (E. SMITH), MARIO RICARDO SMITH (M. SMITH), JAZLINN CHAUTE TAPP, JOHN IVORY WINSTON, JR., and KILA R. WRIGHT, did knowingly and willfully combine, conspire, confederate, and agree with each other and with others known and unknown to the grand jury, to commit Money Laundering in violation of Title 18, United States Code Section 1957, that is, to knowingly engage in and attempt to engage in monetary transactions by, through, and to financial institutions, affecting interstate and foreign commerce, in criminally derived property of a value greater

than \$10,000, such property having been derived from a specified unlawful activity, that is, Conspiracy to Commit Bank Fraud as described in Count 1 of this Indictment.

### **Object of the Conspiracy**

25. It was the purpose and object of the conspiracy to liquidate, withdraw, and obtain for the use of Defendants and their uncharged co-conspirators the funds which had been deposited previously into the accounts for the sham entities through the negotiation of the stolen checks, thereby unjustly enriching the Defendants and their uncharged co-conspirators.

### **Manner and Means**

26. The manner and means by which the foregoing object of the conspiracy to commit money laundering was accomplished included, but was not limited to, the following:

- a. Defendants and their uncharged co-conspirators conducted and attempted to conduct monetary transactions, including, but not limited to, monetary transactions in criminally derived property of a value greater than \$10,000, to liquidate, withdraw, and obtain for the use of Defendants and their uncharged co-conspirators the funds they obtained through completion of the specified unlawful activity described in Count 1 of this Indictment, that is, Conspiracy to Commit Bank Fraud.
- b. Defendants and their uncharged co-conspirators then retained the criminally derived property and used said property for their own benefit and purposes.

All in violation of Title 18, United States Code, Section 1956(h).

**THE GRAND JURY FURTHER CHARGES:****COUNTS 15-50**  
**(Money Laundering Over \$10,000)**

27. Paragraphs 1 through 26 of this Indictment are realleged and incorporated as if set forth fully herein.

28. On or about the dates set forth in the table below, in the Southern District of Iowa and elsewhere, the specified defendant did knowingly engage and attempt to engage in a monetary transaction by, through, and to a financial institution, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, as set forth below, and did aid and abet the same, such property having been derived from a specified unlawful activity, that is, Conspiracy to Commit Bank Fraud as described in Count 1 of this Indictment:

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Description of Transaction</b>
15	10/31/2022	M. SMITH	Exchanging funds in Veridian Credit Union account ending -2721 to purchase a \$13,153.80 official check, number 200303936, payable to "MM Transportation LLC."
16	10/31/2022	M. SMITH	Exchanging funds in Veridian Credit Union account ending -2721 to purchase a \$13,153.80 official check, number 200303937, payable to "TBTKC LLC."
17	10/31/2022	M. SMITH	Exchanging funds in Veridian Credit Union account ending -2721 to purchase a \$13,153.80 official check, number 200303938, payable to "The Lees Transportation LLC."
18	10/31/2022	M. SMITH	Exchanging funds in Veridian Credit Union account ending -2721 to purchase a \$18,750 official check, number 200303871, payable to "Mario R Smith."

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Description of Transaction</b>
19	04/12/2023	HALL	Exchanging funds in GreenState Credit Union account ending -7113 to purchase a \$57,500 official check, number 0001912062, payable to "LEE TRANSPORTATION LLC."
20	04/12/2023	HALL	Exchanging funds in GreenState Credit Union account ending -7113 to purchase a \$27,000 official check, number 0001912075, payable to "NNL LLC."
21	04/12/2023	HALL	Exchanging funds in GreenState Credit Union account ending -7113 to purchase a \$29,700 official check, number 0001912166, payable to "TBTKC LLC."
22	04/13/2023	LEE	Depositing into BMO Bank account ending -8120 a \$57,500 official check, number 0001912062, payable to "LEE TRANSPORTATION LLC."
23	04/13/2023	HALL	Depositing into U.S. Bank account ending -6556 a \$27,000 official check, number 0001912075, payable to "NNL LLC."
24	04/13/2023	J. THOMAS	Depositing into PNC Bank account ending -2697 a \$29,700 official check, number 0001912166, payable to "TBTKC LLC."
25	05/02/2023	HILL	Exchanging funds in GreenState Credit Union account ending -1927 to purchase a \$13,000 official check, check number 0001920036, payable to "SOMORE HILL."
26	05/02/2023	HILL	Exchanging funds in GreenState Credit Union account ending -1927 to purchase a \$50,047 official check, number 0001920017, payable to "LEE TRANSPORTATION LLC."
27	05/04/2023	LEE	Depositing into PNC Bank account ending -2989 a \$50,047 official check, number 0001920017, payable to "LEE TRANSPORTATION LLC."
28	05/17/2023	LEE	Exchanging funds in PNC Bank account ending -2989 to purchase a \$19,500 official check, number 00088377, payable to "KILA R. WRIGHT."



<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Description of Transaction</b>
29	05/18/2023	WRIGHT	Depositing into JPMorgan Chase Bank account ending -3392 a \$19,500 official check, number 00088377, payable to "KILA R. WRIGHT."
30	05/30/2023	C. THOMAS	Exchanging funds in Great Southern Bank account ending -8756 to purchase a \$69,986.16 official check, number 8394764, payable to "LEES TRANSPORTATION LLC."
31	05/30/2023	C. THOMAS	Exchanging funds in Great Southern Bank account ending -8756 to purchase a \$26,012.17 official check, number 8394771, payable to "CARNELL THOMAS JR."
32	05/30/2023	C. THOMAS	Depositing into BMO Bank account ending -4928 a \$26,012.17 official check, number 8394771, payable to "Carnell Thomas Jr."
33	06/01/2023	LEE	Depositing into PNC Bank account ending -2989 a \$69,986.16 official check, number 8394764, payable to "LEES TRANSPORTATION LLC."
34	06/06/2023	LEE	Exchanging funds in PNC Bank account ending -2989 to purchase a \$24,500 official check, number 00088249, payable to "QUEEN'S CLOTHING LLC."
35	06/06/2023	JONES	Depositing into PNC Bank account ending -5395 a \$24,500 official check, number 00088249, payable to "Queen's Clothing LLC."
36	07/03/2023	C. THOMAS	Exchanging funds in Collins Community Credit Union account ending -9337 to purchase a \$36,500 official check, number 131300, payable to "Lees Transportation LLC."
37	07/06/2023	LEE	Depositing into BMO Bank account ending -8120 a \$36,500 official check, number 131300, payable to "Lees Transportation LLC."

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Description of Transaction</b>
38	07/28/2023	RENFROE	Withdrawing \$15,000 from Community Choice Credit Union account ending -9674.
39	07/28/2023	RENFROE	Withdrawing \$15,000 from Community Choice Credit Union account ending -9674.
40	07/28/2023	RENFROE	Withdrawing \$16,000 from Community Choice Credit Union account ending -9674.
41	07/28/2023	RENFROE	Exchanging funds in Community Choice Credit Union account ending -9674 to purchase a \$35,000 official check, number 36255, payable to "Toni Renfroe."
42	07/28/2023	RENFROE	Exchanging funds in Community Choice Credit Union account ending -9674 to purchase a \$70,436.46 official check, number 36278, payable to "Malik Marshall."
43	07/28/2023	RENFROE	Exchanging funds in Community Choice Credit Union account ending -9674 to purchase a \$70,034.89 official check, number 36279, payable to "Lee Transportation LLC."
44	07/28/2023	RENFROE	Exchanging funds in Community Choice Credit Union account ending -9674 to purchase a \$16,000 official check, number 36280, payable to "KIRA JOHNSON."
45	07/28/2023	RENFROE	Depositing into Community Choice Credit Union account ending -9661 a \$35,000 official check, number 36255, payable to "Toni Renfroe."
46	07/28/2023	JOHNSON	Depositing into Greater Iowa Credit Union account with member number ending -8882 a \$16,000 official check, number 36280, payable to "KIRA JOHNSON."
47	07/31/2023	MARSHALL	Depositing into Bank of America account ending -6251 a \$70,436.46 official check, number 36278, payable to "Malik Marshall."
48	08/01/2023	MARSHALL	Transferring \$70,000 from Bank of America account ending -6251 to Bank of America account ending -1231.

<b>Count</b>	<b>Date</b>	<b>Defendant</b>	<b>Description of Transaction</b>
49	08/01/2023	LEE	Depositing into PNC Bank account ending -2989 a \$70,034.89 official check, number 36279, payable to "Lee Transportation LLC."
50	08/04/2023	TAPP	Withdrawing \$12,000 from Financial Plus Credit Union account with membership number ending -3417.

Each of the above counts is a violation of Title 18, United States Code, Sections 1957 and 2.

**THE GRAND JURY FINDS:**

**NOTICE OF FORFEITURE**

1. Upon conviction of the offenses in violation of Title 18 United States Code, Sections 1344 and 1349, as set out in Counts 1 through 13 of this Indictment, Defendants 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 property, real or personal, which constitutes or is derived from proceeds traceable to said offenses.

2. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 1956(h) and 1957, as set out in Counts 14 through 50 of this Indictment, Defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section. § 982(a)(1), any property involved in said offenses and any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, a sum of money equal to the total amount of gross proceeds obtained as a result of these offenses, Counts 1 through 50, with such amount to be at least \$2.1 million.

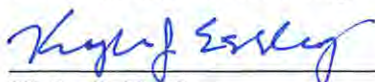
4. If any of the property described above, as a result of any act or omission of the defendant cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty; then the United States shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

**A TRUE BILL.**

\_\_\_\_\_  
FOREPERSON

Richard D. Westphal  
United States Attorney

By:



\_\_\_\_\_  
Kyle J. Essley  
Kristin M. Herrera  
Joseph H. Lubben  
Assistant United States Attorneys