

FILED 3 MAY '17 14:51 USDC-ORP

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

UNDER SEAL

UNITED STATES OF AMERICA,

3:16-CR-00495-HZ

v.

**SUPERSEDING
INDICTMENT**

MARY HOLDEN AYALA,

Defendant.

**18 U.S.C. § 666(a)(1)(A)
18 U.S.C. § 1956(a)(1)(B)(i)
18 U.S.C. § 1957
26 U.S.C. § 7206(1)
26 U.S.C. § 7203
18 U.S.C. § 981(a)(1)(C)
18 U.S.C. § 982(a)(1)
28 U.S.C. § 2461(c)**

UNDER SEAL

THE GRAND JURY CHARGES:

I. INTRODUCTION AND OVERVIEW

1. At all times relevant to this Superseding Indictment, Give Us This Day, Inc., (hereinafter "GUTD") operated as a licensed foster care agency and residential program for youth.
2. GUTD was formed as an Oregon nonprofit corporation on May 15, 1979, by Joshua Phillips and Virginia Phillips. GUTD's 1979 articles of incorporation list multiple purposes for the nonprofit corporation, including the location of homes "for adoptive hard-to-place children."
3. GUTD received funding from state and federal sources for foster care services. GUTD's federal funding originated from Administration for Children and Families (ACF), a

division of the U.S. Department of Health and Human Services. The Oregon Department of Human Services (ODHS) received the federal funds from ACF and distributed those funds, along with state funds, to licensed foster care agencies including GUTD. ODHS contracted with GUTD to provide private foster care agency services, and GUTD submitted invoices to ODHS in conjunction with services GUTD provided to specific foster children.

4. As a licensed foster care agency, GUTD hired and screened foster parents for community placements and paid community-based foster parents for services. GUTD also placed foster children in GUTD residential care or group homes. GUTD hired, screened, and trained residential counselors and house managers in these residential or group foster homes.

5. In calendar years 2011 through 2016, OHDS paid GUTD approximately \$6,534,543.96 for foster care services. Of that amount, federal benefits and assistance from ACF totaled approximately \$1,675,706.18.

6. GUTD filed Annual Reports with the Oregon Secretary of State Corporation Division in each year between 2009 and 2015. In each Annual Report, the principal place of business for GUTD is listed as 9332 Tenino Court, Portland, Oregon. In each Annual Report, **MARY HOLDEN AYALA (AYALA)** is identified as the President of GUTD. In each Annual Report, Mercedes Garcia is identified as the Registered Agent and Secretary for GUTD.

7. From at least 2000 through 2015, **AYALA** served as the President and Executive Director of GUTD and the primary agent of GUTD. As Executive Director, **AYALA** controlled the operations and finances of GUTD.

II. THE SCHEME

8. Beginning at a date unknown to the Grand Jury but at least by January 2009, defendant **AYALA** devised a scheme to embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply GUTD money to pay for personal items and services.

9. Between 2009 and 2015, defendant **AYALA** knowingly converted and intentionally misapplied GUTD funds through purchases she made with debit cards linked to GUTD bank accounts. Examples include but are not limited to:

a. Luxury Retail: **AYALA** spent at least \$25,000.00 of GUTD funds at luxury retail stores including but not limited to Louis Vuitton, Ferragamo, Michael Kors, Coach, and Nordstrom.

b. Cosmetics and Beauty: **AYALA** spent at least \$20,000.00 of GUTD funds at nail salons, beauty supply stores, medical spas, and a cosmetic surgery clinic.

c. Travel: **AYALA** spent at least \$100,000.00 of GUTD funds for personal travel expenses. These expense include, but are not limited to:

i. Casinos: **AYALA** traveled to Horseshoe Casino & Hotel in Louisiana, The Venetian in Las Vegas, and Spirit Mountain Lodge in Oregon.

ii. Luxury Resorts: **AYALA** funded luxury vacations at the San Luis Resort and Spa in Galveston, Texas; the Perdido Beach Resort, in Orange Beach, Alabama; the Hotel Monteleone in New Orleans, Louisiana; and the Westin Maui Resort and Spa in Hawaii.

10. Defendant **AYALA** knowingly converted and intentionally misapplied GUTD funds to her personal use by drawing funds from the GUTD bank accounts to make mortgage loan payments to Gregory Funding for **AYALA**'s residence in West Linn, Oregon. Between

2009 and 2015, **AYALA** diverted at least \$185,000.00 in GUTD funds to Gregory Funding for mortgage loan payments.

11. Defendant **AYALA** knowingly converted and intentionally misapplied GUTD funds to her personal use by drawing funds from the GUTD bank accounts to renovate and remodel her personal residence in West Linn, Oregon. Between 2012 and 2013, **AYALA** diverted at least \$133,155.00 in GUTD funds to Western Oregon Builders for the residential remodeling project.

12. Defendant **AYALA** knowingly converted and intentionally misapplied GUTD funds to her personal use by drawing funds from the GUTD bank accounts to make payments towards the purchase of a commercial property at 4128 NE Martin Luther King Boulevard in Portland, Oregon. Between 2012 and 2015, **AYALA** diverted at least \$138,500.00 in GUTD funds to K. Green, O. Green, and Fidelity National Title in support of the purchase of the property.

13. Defendant **AYALA** knowingly converted and intentionally misapplied GUTD assets by funding independent business ventures with GUTD money. Examples include but are not limited to:

a. In 2013 and 2014, **AYALA** intentionally misapplied and converted at least \$50,000.00 of GUTD funds to pay for rent, payroll, and equipment for DTUG Media.

b. From June 2015 through September 2015, **AYALA** intentionally misapplied and converted at least \$18,000.00 of GUTD money to fund restaurant payroll at Big Mary's Fish & Ribs a.k.a. Mary Marie's.

14. In order to perpetuate and continue her ongoing scheme to embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply GUTD money,

defendant **AYALA** solely controlled accesses to and information regarding GUTD bank accounts and balances. Only **AYALA** served as a signatory on the GUTD bank accounts. **AYALA** controlled the issuance of all GUTD checks. **AYALA** possessed and used the GUTD account debit cards. No one other than **AYALA** could access GUTD bank transaction history or balance details.

15. In order to perpetuate and continue her ongoing scheme to embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply GUTD money, defendant **AYALA** hid her intentional misapplication and conversion of GUTD funds from the GUTD Board of Directors, GUTD employees, and others.

16. In order to perpetuate and continue her ongoing scheme to embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply GUTD money, defendant **AYALA** consistently blamed the Oregon Department of Human Services for financial shortfalls in the GUTD bank accounts.

17. Defendant **AYALA** intentionally deprived GUTD of money intended for use in support of GUTD foster care services, foster care children, and foster care families.

18. Between 2009 and 2015, **AYALA** embezzled, stole, obtained by fraud, knowingly converted to personal use, and intentionally misapplied at least \$800,000.00 of GUTD funds.

COUNT 1
(Theft Concerning Programs Receiving Federal Funds)
18 U.S.C. § 666(a)(1)(A)

19. Paragraphs 1-18 of this Superseding Indictment are hereby re-alleged and are incorporated as though set forth herein.

20. GUTD was an organization that received federal assistance in excess of \$10,000.00 during the one-year period beginning on January 1, 2011 and ending December 31, 2011.

21. As the Executive Director of GUTD, defendant **AYALA** served as the primary agent of GUTD and exercised complete control over the GUTD finances.

22. Between January 1, 2011 and ending December 31, 2011, defendant **AYALA** did embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply more than \$5,000.00 under the care, custody, and control of GUTD, all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 2
(Theft Concerning Programs Receiving Federal Funds)
18 U.S.C. § 666(a)(1)(A)

23. Paragraphs 1-18 of this Superseding Indictment are hereby re-alleged and are incorporated as though set forth herein.

24. GUTD was an organization that received federal assistance in excess of \$10,000.00 during the one-year period beginning on January 1, 2012 and ending December 31, 2012.

25. As the Executive Director of GUTD, defendant **AYALA** served as the primary agent of GUTD and exercised complete control over the GUTD finances.

26. Between January 1, 2012 and ending December 31, 2012, defendant **AYALA** did embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply more than \$5,000.00 under the care, custody, and control of GUTD; all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 3
(Theft Concerning Programs Receiving Federal Funds)
18 U.S.C. § 666(a)(1)(A)

27. Paragraphs 1-18 of this Superseding Indictment are hereby re-alleged and are incorporated as though set forth herein.

28. GUTD was an organization that received federal assistance in excess of \$10,000.00 during the one-year period beginning on January 1, 2013 and ending December 31, 2013.

29. As the Executive Director of GUTD, defendant **AYALA** served as the primary agent of GUTD and exercised complete control over the GUTD finances.

30. Between January 1, 2013 and ending December 31, 2013, defendant **AYALA** did embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply more than \$5,000.00 under the care, custody, and control of GUTD, all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 4
(Theft Concerning Programs Receiving Federal Funds)
18 U.S.C. § 666(a)(1)(A)

31. Paragraphs 1-18 of this Superseding Indictment are hereby re-alleged and are incorporated as though set forth herein.

32. GUTD was an organization that received federal assistance in excess of \$10,000.00 during the one-year period beginning on January 1, 2014 and ending December 31, 2014.

33. As the Executive Director of GUTD, defendant **AYALA** served as the primary agent of GUTD and exercised complete control over the GUTD finances.

34. Between January 1, 2014 and ending December 31, 2014, defendant **AYALA** did embezzle, steal, obtain by fraud, knowingly convert to personal use, and intentionally misapply more than \$5,000.00 under the care, custody, and control of GUTD, all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 5
(Theft Concerning Programs Receiving Federal Funds)
18 U.S.C. § 666(a)(1)(A)

35. Paragraphs 1-18 of this Superseding Indictment are hereby re-alleged and are incorporated as though set forth herein.

36. GUTD was an organization that received federal assistance in excess of \$10,000.00 during the one-year period beginning on January 1, 2015 and ending December 31, 2015.

37. As the Executive Director of GUTD, defendant **AYALA** served as the primary agent of GUTD and exercised complete control over the GUTD finances.

38. Between January 1, 2015 and ending December 31, 2015, defendant **AYALA** did embezzle, steal, obtain by fraud, knowingly convert to personal use and intentionally misapply more than \$5,000.00 under the care, custody, and control of GUTD, all in violation of 18 U.S.C. § 666(a)(1)(A).

COUNT 6
(Money Laundering - Concealment)
18 U.S.C. § 1956(a)(1)(B)(i)

39. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 38 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

40. Beginning in or around December of 2012, defendant **AYALA** personally entered into an agreement to purchase the commercial property located at 4128 NE Martin Luther King Junior Boulevard, Portland, Oregon 97211 (hereinafter “the Property”). The owners, K. Green and O. Green, agreed to sell the property for \$300,000.00 using a trust deed with a monthly payment amount of \$4,813.

41. In conjunction with the agreement to purchase the Property, on or about May 1, 2013, K. Green and O. Green executed a statutory warranty deed granting the Property to **AYALA**.

42. In or around October of 2014, **AYALA** discontinued regular monthly payments to K. Green and O. Green.

43. Despite filing notices of default and election to sell in March of 2015 and December of 2015, the Greens continued to negotiate with **AYALA** in an effort to allow **AYALA** to avoid foreclosure and complete the purchase under the terms of the initial purchase contract.

44. Between December 2012 and July 2015, **AYALA** diverted at least \$138,671.76 of GUTD funds for the purchase of and payments on the Property.

45. As part of ongoing negotiations, on or about May 31, 2016, **AYALA** deeded the Property back to K. Green and O. Green as she sought a buyer for the Property.

46. According to Oregon Secretary of State Corporation Division records, MLK Property Group, LLC (hereinafter “MLK Property Group”) registered as an entity on August 18, 2016. The Articles of Organization filed with the Oregon Secretary of State Corporation Division list Anthony Beard as the organizer and registered agent at 4825 NE Garfield Avenue,

Portland, Oregon. **AYALA**'s name and address are not associated with MLK Property Group's corporate public filings.

47. On or about August 19, 2016, **AYALA** opened Bank of America account xx2265 in the name of MLK Property Group. **AYALA** is the sole authorized signer on the account and states her title is "member manager."

48. Based on title records and documents obtained from Fidelity National Title Company of Oregon, **AYALA** formed MLK Property Group on August 18, 2016, as the sole member. Based on the MLK Property Group operating agreement, the stated purpose of MLK Property Group is to own and operate real property and to engage in all activities incidental to that purpose. The operating agreement states 100 percent of income will be allocated to the member. The MLK Property Group operating agreement states the member's name is Mary **AYALA** with an address at 4128 NE MLK Jr. Blvd, Portland, Oregon 97211.

49. On or about September 1, 2016, K. Green and O. Green executed a statutory warranty deed granting the Property to MLK Property Group for \$305,000.00.

50. On or about September 6, 2016, **AYALA**, on behalf of MLK Property Group, sold the Property to Dozer Construction, LLC for \$800,000.00. Among the disbursements to **AYALA** were \$306,406.00 to close the acquisition escrow advance (payable to K. Green and O. Green), \$10,000.00 in earnest money, and \$63,355.38 due to **AYALA** at closing.

51. On or about the date listed below, in the District of Oregon and elsewhere, defendant **AYALA**, did knowingly conduct and attempt to conduct the financial transaction listed below, affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is theft concerning programs receiving federal funds, in violation of 18 U.S.C. § 666(a)(1)(A), knowing that the transaction was designed in whole and in part to

conceal and disguise the nature, the location, the source, the ownership, and the control of proceeds of some form of unlawful activity:

Count	Date	Financial Transaction	Total Amount
6	September 6, 2016	Wire from U.S. Bank account xx8687 in the name of the title company for the Dozer Construction, LLC transaction to Bank of America account xx2265 in the name of MLK Property Group, LLC	\$63,355.38

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS 7 AND 8

(Engaging in Monetary Transactions in Criminally Derived Property)

18 U.S.C. § 1957

52. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 51 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

53. On or about the dates listed below, in the District of Oregon and elsewhere, defendant **AYALA** did knowingly engage and attempt to engage in monetary transactions by, through, and to a financial institution, affecting interstate and foreign commerce, with criminally derived property of a value greater than \$10,000.00, that is, the purchase of cashier's checks and the writing of checks on the dates listed below, such property having been derived from specified unlawful activity, that is theft concerning programs receiving federal funds, in violation of 18 U.S.C. § 666(a)(1)(A), each such monetary transaction being a separate count of this Indictment:

Count	Date	Amount	Description of Transaction
7	May 1, 2013	\$20,000.00	Transfer of a cashier's check to Fidelity National Title Company, funded from GUTD Bank of America account xx0790.
8	August 20, 2013	\$19,000.00	Deposit of cashier's check into Mary Ayala's personal JPMorgan Chase Bank account xx0170, funded from GUTD Bank of America account xx0790.

All in violation of Title 18, United States Code, Section 1957.

COUNT 9
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

54. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 53 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

55. On or about September 30, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 and Form 2106 for calendar year 2009, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2009 U.S. Individual Income Tax Return, Form 1040, that was filed with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$49,682.00, that her taxable income, Line 43, was \$7,029.00, and that her Form 2106 reimbursements from employer, Line 7, were \$57,680.00, and that her total expenses, Line 6, were \$7,998.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 10
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

56. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 55 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

57. On or about September 30, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 and Form 2106 for calendar year 2010, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2010 U.S. Individual Income Tax Return, Form 1040, that was filed with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$33,360.00, that her taxable income, Line 43, was \$5,480.00, and that her Form 2106 reimbursements from employer, Line 7, were \$56,977.00, and that her total expenses, Line 6, were \$23,617.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 11
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

58. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 57 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

59. On or about September 30, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 and Form 2106 for calendar year 2011, which was verified by a written declaration that it

was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2011 U.S. Individual Income Tax Return, Form 1040, that was filed with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$59,867.00, that her taxable income, Line 43, was \$3,218.00, and that her Form 2106 reimbursements from employer, Line 7, were \$74,116.00, and that her total expenses, Line 6, were \$14,249.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 12
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

60. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 59 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

61. On or about September 30, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 and Form 2106 for calendar year 2012, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2012 U.S. Individual Income Tax Return, Form 1040, that was filed with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$42,676.00, that her taxable income, Line 43, was \$10,302.00, and that her Form 2106 reimbursements from employer, Line 7, were \$90,357.00, and that her total expenses, Line 6, were \$47,681.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 13
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

62. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 61 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

63. On or about September 30, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 and Form 2106 for calendar year 2013, which was verified by a written declaration that it was made under the penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2013 U.S. Individual Income Tax Return, Form 1040, that was filed with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$31,543.00, that her taxable income, Line 43, was \$14,127.00, and that her Form 2106 reimbursements from employer, Line 7, were \$60,684.00, and that her total expenses, Line 6, were \$29,141.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 14
(Filing a False Federal Tax Return)
26 U.S.C. § 7206(1)

64. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 63 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

65. On or about April 15, 2015, in the District of Oregon and elsewhere, defendant **AYALA** did willfully make and subscribe a U.S. Individual Income Tax Return, Form 1040 for calendar year 2014, which was verified by a written declaration that it was made under the

penalties of perjury and which she did not believe to be true and correct as to every material matter. That 2014 U.S. Individual Income Tax Return, Form 1040, that was filed electronically with the IRS, stated that defendant **AYALA**'s wages and salaries, Line 7, were \$35,101.00, that her taxable income, Line 43, was \$9,239.00, whereas, she then and there knew and believed that said items were material and false; all in violation of 26 U.S.C. § 7206(1).

COUNT 15
(Failure to File Individual Tax Return)
26 U.S.C § 7203

66. The Grand Jury re-alleges each and every allegation contained in each of the paragraphs 1 through 65 of this Superseding Indictment, and incorporates them by reference as if set forth herein.

67. During the calendar year 2015, defendant **AYALA**, had and received substantial taxable gross income; by reason of such gross income, defendant **AYALA** was required by law, following the close of the calendar year 2015 and on or before April 15, 2016, to make an income tax return to the Internal Revenue Service Center, in Portland, Oregon, to a person assigned to receive returns at the local office of the Internal Revenue Service in Portland, Oregon, or to another Internal Revenue Service office permitted by the Commissioner of Internal Revenue, stating specifically the items of her gross income and any deductions and credits to which she was entitled; well knowing and believing all of the foregoing, she did willfully fail, on or about April 15, 2016, in the District of Oregon and elsewhere, to make an income tax return; all in violation of Title 26, United States Code, Section 7203.

FIRST FORFEITURE ALLEGATION

Upon conviction of a offense alleged in Counts 1 to 5 of this Superseding Indictment, defendant **AYALA** shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property constituting or derived from proceeds traceable to the violation.

If any of the above-described forfeitable property, 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 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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 2323(b)(2)(A), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

SECOND FORFEITURE ALLEGATION

Upon conviction of any of the offenses alleged in Counts 6 to 9 of this Superseding Indictment, defendant **AYALA** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, or any property traceable to such property, involved in the offense alleged in Counts 6 to 8.

If any of the above-described forfeitable property, 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 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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by 18 U.S.C. § 2323(b)(2)(A), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

Dated this 2 day of May 2017.

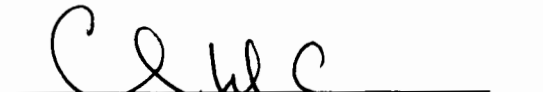
A TRUE BILL

OFFICIATING FOREPERSON

Presented by:

BILLY J. WILLIAMS
United States Attorney


DONNA BRECKER MADDUX, OSB #027357


CLEMON D. ASHLEY, ILB #6294839
Assistant United States Attorneys