

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
EVANSVILLE DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	Cause No. 3:20-cr-18 RLY-MPB
)	
ANDREA RENEE PYTLINSKI and)	-01
)	
ROSE ANN AZZARELLO,)	-02
)	
Defendants.)	

SUPERSEDING INDICTMENT

GENERAL ALLEGATIONS

Banks, Business Entities, and Persons Involved

1. At all times relevant to this Indictment, Field and Main Bank was a financial institution insured by the Federal Deposit Insurance Corporation engaged in banking activities that affect interstate commerce within the Southern District of Indiana. At all times relevant to this Indictment, Unify Financial Credit Union was a financial institution insured by the National Credit Union Administration Board engaged in banking activities that affect interstate commerce within the Southern District of Indiana.

2. The businesses identified in this Indictment, Malinda Properties, LLC and Door Engineering and Manufacturing, LLC, at the times relevant to this Indictment, were organizations that engage in business activities that affect interstate commerce.

3. Persons “BG” “WS” “JD” “FM” “GG” and “JF” are actual persons known to the

Grand Jury. Unauthorized applications for unemployment insurance were made to the Employment Security Department of the State of Washington using the names and personal information of these persons through internet portals.

The Unemployment Insurance Scheme

4. The Employment Security Department of Washington State (ESD) is the state agency that oversees the Unemployment Insurance (UI) program in Washington State. Through this agency, UI benefits may be issued to Washington residents who are unemployed because of the nationwide Coronavirus (COVID-19) pandemic.

5. In general, a person seeking UI benefits through the ESD can complete an online application that includes, among other things, the claimant's name, date of birth, social security number, and the reason why the claimant is unemployed. To be eligible for benefits, the claimant (1) must have been recently employed in the state of Washington in the past 12-18 months for a minimum of 680 hours; (2) must be currently unemployed; (3) must be able and available to work; and (4) must be actively seeking suitable full-time employment.

6. Approved claimants can also request continuous weekly benefits. To do so, the claimants must recertify online every week that they remain unemployed and eligible to continue receiving UI benefits.

7. In Washington State, UI compensation funds are most often issued in the form of a direct deposit into the claimant's designated bank account or pre-paid debit card account.

8. On March 27, 2020, the President signed into law the Coronavirus Aid, Relief, and Economic Security (CARES) Act. This legislation provides emergency assistance for individuals, families, and businesses affected by the COVID-19 pandemic.

9. Section 2102 of the CARES Act creates a new temporary federal program called Pandemic Unemployment Assistance (PUA) that provides up to 39 weeks of unemployment benefits and funding to states for the administration of the program. An individual receiving PUA benefits may also receive a \$600 weekly benefit amount under the Federal Pandemic Unemployment Compensation (FPUC) program if he or she is eligible for such compensation for the week claimed.

10. The CARES Act was designed to mitigate the economic effects of the COVID-19 pandemic in a variety of ways. The CARES Act includes a provision of temporary benefits for individuals who have exhausted their entitlement to regular unemployment compensation (UC), as well as coverage for individuals who are not eligible for regular UC, are self-employed, or have limited recent work history.

11. Records from the Employment Security Department of the State of Washington show applications associated with the electronic funds transfers identified in the specific offenses named in this indictment. The applications, which were made using an internet portal, directed UI payments for deposit into accounts controlled by AZZARELLO and PYTLINSKI with Field and Main Bank and Unify Financial Credit Union. The persons identified as UI applicants did not actually make an application and did not authorize any such application or the transmissions of funds to AZZARELLO and PYTLINSKI.

12. After the UI funds were deposited into the accounts controlled by AZZARELLO and PYTLINSKI, AZZARELLO, PYTLINSKI, and another individual known to the Grand Jury immediately withdrew the funds in cash or attempted to do so.

13. These General Allegations are re-alleged and incorporated by reference in each wire

fraud and bank fraud count of this indictment as if set forth in full.

SPECIFIC OFFENSES

Counts 1-3

[18 U.S.C. § 1343 - Wire Fraud]

The Grand Jury charges that:

14. The General and the Unemployment Insurance Scheme allegations are re-alleged and incorporated herein as if set out in full.

15. Between on or about May 1, 2020, and May 31, 2020, in the Southern District of Indiana, and elsewhere,

ANDREA RENEE PYTLINSKI,

a defendant herein, knowingly devised and intended to devise a scheme to defraud the Employment Security Department of the State of Washington, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and aided and abetted others in so doing, and for purposes of executing the scheme, and attempting so to do, did transmit and cause to be transmitted by means of wire communication in interstate commerce, any writings, signs, signals, pictures, or sounds, to wit: PYTLINSKI transmitted and caused to be transmitted, by means of interstate wire communication, electronic funds transfers from the Employment Security Department of the State of Washington, and aided and abetted others in so doing, as specified in each count below.

COUNT NUMBER	DATE OF ELECTRONIC FUNDS TRANSFER	BANK ACCOUNT RECEIVING FUNDS TRANSFER	UNEMPLOYMENT INSURANCE PAYEE
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		AMOUNT	
		DISPOSITION OF FUNDS	
1	8 May 2020	Field and Main Account Number XX5126 \$8,530 \$8,000 cash withdrawal on 8 May 2020 by PYTLINSKI	Person JD
2	13 May 2020	Field and Main Account Number XX5126 \$9,920 \$9,800 cash withdrawal on 13 May 2020 by PYTLINSKI	Person FM
3	11 May 2020	Unify Financial Credit Union Account Number XX6776 \$8,530 Reversed back to State of Washington	Person JF

All of which is in violation of Title 18, United States Code, Sections 2, 1343 and 1349.

Counts 4-6

[18 U.S.C. § 1343 - Wire Fraud]

The Grand Jury further charges that:

16. The General and the Unemployment Insurance Scheme allegations are re-alleged and incorporated herein as if set out in full.

17. Between, on or about May 1, 2020, and May 31, 2020, in the Southern District of Indiana, and elsewhere,

ROSE ANN AZZARELLO,

a defendant herein, knowingly devised and intended to devise a scheme to defraud the Employment Security Department of the State of Washington, and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and aided and abetted others in so doing, and for purposes of executing the scheme, and attempting so to do, did transmit and cause to be transmitted by means of wire communication in interstate commerce, any writings, signs, signals, pictures, or sounds, to wit: AZZARELLO transmitted and caused to be transmitted, by means of interstate wire communication, electronic funds transfers from the Employment Security Department of the State of Washington, and aided and abetted others in so doing, as specified in each count below.

COUNT NUMBER	DATE OF ELECTRONIC FUNDS TRANSFER	BANK ACCOUNT RECEIVING FUNDS TRANSFER AMOUNT DISPOSITION OF FUNDS	UNEMPLOYMENT INSURANCE PAYEE
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4	12 May 2020	Field and Main Account Number XX5073 \$9,072 \$9,000 cash withdrawal on 12 May 2020 by Individual #1 known to the grand jury	Person BG
5	14 May 2020	Field and Main Account Number XX5073 \$9,103 Reversed back to State of Washington	Person WS
6	11 May 2020	Unify Financial Credit Union Account Number XX7081 \$7,740 Reversed back to State of Washington	Person GG

All of which is in violation of Title 18, United States Code, Sections 2, 1343 and 1349.

Count 7

[18 U.S.C. § 1344 - Bank Fraud Conspiracy]

The Grand Jury further charges that:

18. The General and the Unemployment Insurance Scheme allegations are re-alleged and incorporated herein as if set out in full.

19. Between, on or about May 1, 2020, and May 31, 2020, in the Southern District of Indiana, and elsewhere,

ANDREA RENEE PYTLINSKI and ROSE ANN AZZARELLO,

the defendants herein, did knowingly conspire with each other and others known and unknown to the Grand Jury to commit the offense of Bank Fraud, defined by Title 18, United States Code, Section 1344(2) as knowingly executing or attempting to execute a scheme or artifice to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of Field and Main Bank, a financial institution insured by the Federal Deposit Insurance Corporation, by means of false or fraudulent pretenses, representations, or promises, and PYTLINSKI and AZZARELLO performed certain overt acts to effect the object of the conspiracy, including, but not limited to, the following overt acts:

A. PYTLINSKI opened a Field and Main Bank joint checking account bearing account number XX5126 with AZZARELLO.

B. AZZARELLO opened a Field and Main Bank joint checking account bearing account number XX5073 with Individual #1 known to the Grand Jury.

C. PYTLINSKI and AZZARELLO provided the routing numbers for the Field and Main Bank checking accounts bearing account numbers XX5126 and XX5073 to another person for

the purpose of receiving electronic funds transfers from the Washington State Employment Security Department.

D. On or about May 8, 2020 PYTLINSKI withdrew \$8,000 in cash from Field and Main Bank account number XX5126 after unemployment insurance funds from the Washington State Employment Security Department, in the name of Person JD, were deposited into the account through an electronic funds transfer.

E. On or about May 13, 2020 PYTLINSKI withdrew \$9,800 in cash from Field and Main Bank account number XX5126 after unemployment insurance funds from the Washington State Employment Security Department, in the name of Person FM, were deposited into the account through an electronic funds transfer.

F. On or about May 12, 2020 AZZARELLO directed Individual #1 known to the Grand Jury to make a cash withdrawal from Field and Main Bank account number XX5073 after unemployment insurance funds from the Washington State Employment Security Department, in the name of Person BG, were deposited into the account through an electronic funds transfer.

G. After converting the electronic funds transfers to cash proceeds, PYTLINSKI and AZZARELLO kept a share of the funds and transferred a share of the funds to other participants in the conspiracy.

All of which is in violation of Title 18, United States Code, Sections 1344 and 1349.

Count 8

[18 U.S.C. § 513 - Possession of a Counterfeited Security]

The Grand Jury further charges that:

20. On or about October 25, 2016, in the Southern District of Indiana, and elsewhere,

ANDREA RENEE PYTLINSKI,

a defendant herein, did make, utter, and possess a counterfeited security of an organization, with intent to deceive another person or organization, and aided and abetted others in so doing, to wit: PYTLINSKI deposited a counterfeit check into an account she controlled with Heritage Federal Credit Union. The check in the amount of \$8,000 was purportedly from the First County Bank account of Malinda Properties LLC, a business organization that engages in business activities that affect interstate commerce.

All of which is in violation of Title 18, United States Code, Sections 2 and 513.

Count 9

[18 U.S.C. § 513 - Possession of a Counterfeited Security]

The Grand Jury further charges that:

21. On or about April 2, 2019, in the Southern District of Indiana, and elsewhere,

ROSE ANN AZZARELLO,

a defendant herein, did make, utter, and possess a counterfeited security of an organization, with intent to deceive another person or organization, and aided and abetted others in so doing, to wit: AZZARELLO attempted to deposit a counterfeit check into an account she controlled with Heritage Federal Credit Union. The check, numbered 91421, in the amount of \$19,500.12 was purportedly from the PNC Bank account of Door Engineering and Manufacturing LLC, a

business organization that engages in business activities that affect interstate commerce.

All of which is in violation of Title 18, United States Code, Sections 2 and 513.

Count 10

[18 U.S.C. § 513 - Possession of a Counterfeited Security]

The Grand Jury further charges that:

22. On or about April 2, 2019, in the Southern District of Indiana, and elsewhere,

ROSE ANN AZZARELLO,

a defendant herein, did make, utter, and possess a counterfeited security of an organization, with intent to deceive another person or organization, and aided and abetted others in so doing, to wit: AZZARELLO attempted to deposit a counterfeit check into an account she controlled with Commerce Bank. The check, numbered 91420, in the amount of \$19,500.20 was purportedly from the PNC Bank account of Door Engineering and Manufacturing LLC, a business organization that engages in business activities that affect interstate commerce.

All of which is in violation of Title 18, United States Code, Sections 2 and 513.

Count 11

[18 U.S.C. §§ 1956(a) and 1956(h) - Conspiracy to Commit Money Laundering]

The Grand Jury further charges that:

23. The Allegations contained in Paragraphs 1-19 are re-alleged and incorporated herein as if set out in full.

24. On or about May 8, 2020, PYTLINSKI made a cash withdrawal from Field and Main Bank in the amount of \$8,000 from account XX5126.

25. On or about May 12, 2020, Individual #1, a person known to the grand jury, made a cash withdrawal from Field and Main Bank in the amount of \$9,000 from account XX5073 after being directed to make the withdrawal by AZZARELLO and PYTLINSKI.

26. On or about May 13, 2020, PYTLINSKI made a cash withdrawal from Field and Main Bank in the amount of \$9,800 from account XX5126.

27. Text messages from PYTLINSKI to and from the phone number +1XXXXXXX7487 (hereafter +1 7487) from July 2, 2020, to July 9, 2020, show multiple messages discussing the movement funds utilizing various financial platforms and currencies such as **N26** (N26 is a mobile banking platform. N26 is self-described as a 100% digital banking experience designed to be simple, secure, and transparent.), **Netspend** (Netspend provides prepaid debit cards to users. Netspend is self-described as a provider of products that are designed for people who don't have a traditional bank account or who prefer to use alternative financial services.), **Bitcoin** (Bitcoin is a de-centralized digital currency, without a central bank or single administrator, that can be sent from user to user on the peer-to-peer bitcoin network without the need for intermediaries. Transactions are verified by network nodes through cryptography and recorded in a publicly distributed ledger called a blockchain.), **Cash App** (Cash App is a peer-to-peer payment software application that can be used to send, receive, and request money. Cash App is self-described as the fastest way to convert dollars to bitcoin.), **Lili** (Lili is a banking software application that is oriented toward freelancers and small business owners. Lili advises users that no account fees are imposed and that users only need a social security number to sign up for the service.), United States Postal Service (USPS) Money Orders, and Western Union money orders, including the messages summarized below:

A. On or about July 2, 2020, PYTLINSKI sent a screenshot to +1 7487 showing five USPS money orders. Four of the money orders were for \$1,000 and one was for \$600.

B. On or about July 2, 2020, PYTLINSKI sent a screenshot to +1 7487 showing three Western Union money orders. The three money orders were for \$1,000, \$500, and \$300.

C. On or about July 2, 2020, PYTLINSKI sent a screenshot to +1 7487 showing a ledger listing multiple amounts. The top of the ledger stated "Left to Cash" with the following items listed below: "1,800. – Western Union Money Orders", "4,600. – Post Office Money Orders", "4,770. – Cash", "960.00 – to be pulled off today (Netspend)" and "1,960.00 – to be pulled off (N26 card)."

D. On or about July 2, 2020, +1 7487 sent a text message to PYTLINSKI stating, "Check the balance of moms cash app and send to me." AZZARELLO is PYTLINSKI's mother. On or about July 2, 2020, PYTLINSKI sent a response to +1 7487 stating, "Ok" and "I will check it when I get my hands on her phone." +1 7487 responded, "I told you to take the online access and login in your phone to take control" and "Why didn't you take up till now?" PYTLINSKI responded, "I had the phone until yesterday when dad's disappeared." +1 7487 responded, "That was the reasons we buy one phone for the other cash app and your phone for moms cash app."

E. On or about July 2, 2020, +1 7487 sent a message to PYTLINSKI asking, "How much have you withdrawn in total?" PYTLINSKI responded in a message, "3000 something Williams." +1 7487 then instructed PYTLINSKI in a message by saying, "Ok put the 3000 in bitcoin." +1 7487 later sent a message stating, "After putting the money orders cash of 2800

tomorrow on bitcoin. Before you can withdraw the 1960 that's in N26 and put it on bitcoin on Monday." PYTLINSKI replied, "Ok" and later "ATM done."

F. On or about July 2, 2020, +1 7487 sent a message to PYTLINSKI stating, "Send me the screenshot of the bitcoin balance." PYTLINSKI replied with a screenshot of the financial application that showed a bitcoin balance of \$2,807.46. +1 7487 sent a subsequent message that stated, "18dL8CoZrryunVuHVU5ue9XvZCGwhH8dN1." +1 7487 later asked, "Did you get the bitcoin address?" and "Let me know when is done." PYTLINSKI replied, "Done."

G. On or about July 3, 2020, +1 7487 sent a message to PYTLINSKI stating, "Check the balance of moms cash app and send to me." PYTLINSKI replied with a screenshot of a financial application showing a cash balance of \$1,422.00. +1 7487 replied, "You should start getting ready to move the 330 that's in the netspend card so you can put the 2800 on bitcoin." PYTLINSKI replied, "Already have" and "I came into Evansville early."

H. On or about July 3, 2020, +1 7487 asked PYTLINSKI, "How much cash do you have on hand?" PYTLINSKI replied, "2750." +1 7487 responded, "ok honey" and "After putting the 2750 on bitcoin. You can start pulling the 1960 on N26 so by Tomorrow you can put the 1960 on bitcoin." PYTLINSKI responded, "Ok."

I. On or about July 3, 2020, +1 7487 asked PYTLINSKI, "Sweetheart do you need my bitcoin address now to send the 1400 on cash app?" PYTLINSKI replied, "Sure." +1 7487 then sent; "ok babe, 1ECjpbXrTAGkKaJhYyAziRS5qVfDnEQmRE" and "Let me know when you done." PYTLINSKI replied, "I will have to finish it when I get to mom" and "I need her ID." +1 7487 responded, "Ok when you done let me know to send you a new address."

J. On or about July 3, 2020, +1 7487 sent PYTLINSKI a text message stating, "Please note: the 2600 you cash today will be put on bitcoin on Sunday."

K. On or about July 3, 2020, +1 7487 sent PYTLINSKI a text message stating, "When a deposit of 4000 was made on the N26 bank and you withdraw 3000 and is left with 960. Was it not the 3000 you withdrawn on N26 card you put on bitcoin yesterday?"

L. On or about July 4, 2020, PYTLINSKI sent +1 7487 a text message stating, "I will finish cash app in morning because I need mom's face." +1 7487 responded, "Ok honey" and "Let me send you bitcoin address." PYTLINSKI replied, "Ok." +1 7487 then sent a message with, "1ECjpbXrTAgkKaJhYyAziRS5qVfDnEQmRE" and "Let me know when is done." PYTLINSKI replied, "Done."

M. On or about July 4, 2020, PYTLINSKI sent +1 7487 a message stating, "There is another 3000 on cash app." +1 7487 replied, "Ok sweetheart." and "You will make sure moms finish all the bitcoin verification so her weekly limit should be 7500 to send bitcoin."

N. On or about July 4, 2020, +1 7487 sent PYTLINSKI a text message stating, "Let me know when you get to chasers." PYTLINSKI replied, "Ok" and a short time later "I am here." +1 7487 sent back, "Ok" and "Let me know when you done." PYTLINSKI then replied "Done" and "CoinFlip ATM Receipt TX ID: RDKIBB Time: 07/04/2020 01:13:44 PM Price: 2940 USD Crypto: 0.30252954 BTC Destination: 1EwMRxCFMWmDkKh8xVrwBj2CqAw1ahkGTS." +1 7487 sent back, "Thanks Sweetheart" and then sent, "18e7SFUFStBRwyPNj2uAC1oLKyCiHQMFJ Let me know when done" and "That's the bitcoin address." PYTLINSKI replied, "Done."

O. On or about July 4, 2020, +1 7487 sent PYTLINSKI a text message stating, "Sweetheart can you check the cash app. They send 1000 through the \$cashtag we gave them." PYTLINSKI replied with two screenshot from a financial application showing a cash balance of \$4,377.00 and a \$1,000 deposit from an individual, a \$3,360 credit from "State of Arizona Bene...", a Bitcoin purchase of \$1,405 and a credit of \$1,422 from "Odjfs-pua Federal."

P. On or about July 4, 2020, +1 7487 sent a message to PYTLINSKI stating, "You can start moving money on N26."

Q. On or about July 5, 2020, +1 7487 sent the following to PYTLINSKI, "I sent a code to my phone number, Have you seen it?" PYTLINSKI replied, "I will have to check" and "I have not used that phone since we set it up." +1 7487 replied, "You should be using the phone honey" and "Take it around with you."

R. On or about July 5, 2020, PYTLINSKI sent a message to +1 7487 stating, "I am at chasers." +1 7487 replied, "Ok." PYTLINSKI responded, "Done" and "I can do either one when you are ready." +1 7487 then sent "1NwBj8mwqgJDH3sxCAehLLy8mRC9nDJNZd" to PYTLINSKI and then messaged "Ok honey. Let me know when you done." PYTLINSKI replied "Bitcoin." +1 7487 responded, "That's the bitcoin address honey." PYTLINSKI responded, "Coin flip" and "Block chain." +1 7487 asked, "Have you seen the bitcoin address I sent?" PYTLINSKI replied, "Yes" +1 7487 then stated, "ok you can send the 1100 first" and "Let me know when is done." PYTLINSKI replied, "Done" and sent a screenshot showing bitcoin was purchased in the amount of \$1,028.14. +1 7487 then sent, "13zAeXSSVy2cg47C6mLCP2Jdv4xtVQfuL5." PYTLINSKI replied, "Ok" and "How much?" +1 7487 sent, "You can send 2000 to this address" and "2000." PYTLINSKI replied, "Done" and

sent a screenshot showing a withdrawal of .22 bitcoin to wallet

13zAeXSSVy2cg47C6mLCP2Jdv4xtVQfuL5.

S. On or about July 5, 2020, +1 7487 sent a message to PYTLINSKI stating, "Do you want me to send you address to try and send another 2000?" PYTLINSKI replied, "Sure." +1 7487 then sent PYTLINSKI a message stating, "12LRJkefqhbQXZiKqnChPjohnvh2E1AhfN" and "That's the address for 2000."

T. On or about July 6, 2020, PYTLINSKI replied, "You can only get 2000 a day honey." +1 7487 responded, "Cool. Now we know" and "Tomorrow we do another one."

U. On or about July 7, 2020, PYTLINSKI sent +1 7487 a screenshot from a financial application showing a cash balance of \$4,602.39. +1 7487 replied, "Ok you can put 2000 on bitcoin." PYTLINSKI responded, "I will start moving it today." +1 7487 then stated, "Let me send the bitcoin address so you put 2000 on bitcoin." PYTLINSKI replied, "Go for it." +1 7487 sent "12LRJkefqhbQXZiKqnChPjohnvh2E1AhfN" to PYTLINSKI and then stated. "That's the address for 2000" and "Let me when you done." PYTLINSKI replied, "Done" and sent a screenshot showing a withdrawal of .21 bitcoin to the wallet

12LRJkefqhbQXZiKqnChPjohnvh2E1AhfN.

28. On or about July 8, 2020, text messages between PYTLINSKI and +1 7487 mention that two MacBook computers were purchased from Walmart.com. On or about July 8, 2020, text messages between PYTLINSKI and +1 7487 mention that two MacBook computers were purchased online from Best Buy. On or about July 8, 2020 a screenshot from a financial application was sent from PYTLINSKI to +1 7487. The screenshot shows a purchase from BESTBUY.COM in the amount of \$2,781.98. The screenshot also indicates a purchase was

made from WALMART.COM. On July 9, 2020, PYTLINSKI was in possession of four boxed brand-new MacBook Pro, Model A2289, laptop computers.

29. Between, on or about May 1, 2020, and July 8, 2020, within the Southern District of Indiana and elsewhere,

ANDREA RENEE PYTLINSKI and ROSE ANN AZZARELLO,

the defendants herein, did knowingly conspire with each other and others known and unknown to the Grand Jury, to commit the offense of money laundering (defined by Title 18, United States Code, Section 1956(a)(1) as, knowing that the property involved in a financial transaction represents the proceeds of some form of unlawful activity, conducting and attempting to conduct such a financial transaction which in fact involves the proceeds of specified unlawful activity (A)(i) with the intent to promote the carrying on of specified unlawful activity, and (B) knowing that the transaction is designed in whole or in part (i) to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of specified unlawful activity.

In violation of Title 18, United States Code, Sections 1956(a) and 1956(h).

FORFEITURE

1. Pursuant to Federal Rule of Criminal Procedure 32.2, the United States hereby notifies the defendants that it will seek forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 1956(c)(7)(A), 1961(1) and Title 28, United States Code, Section 2461(c) as part of any sentence imposed.

2. Upon conviction of an offense in violation of Title 18, United States Code, Sections 1343, 1344, and 1349, as set forth in this Indictment, the 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 the offense or a sum of money equal to the total amount of the proceeds of the offense (money judgment). Upon conviction of an offense in violation of Title 18, United States Code, Section 1956, as set forth in this Indictment, the defendant shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 982(a)(1), any property, real or personal, involved in such offense, and any property traceable to such property.

3. The property to be forfeited includes, but is not limited to, the following:
 - A. United States currency in the amount of \$1,665 seized on July 9, 2020;
 - B. Four MacBook Pro, Model A2289, laptop computers bearing partial serial numbers QFP3YL, E9P3YL, S8P3YL, and ZP3YL seized on July 9, 2020; and
 - C. Funds totaling \$1,293.24 seized from Field and Main Bank account number XX5703 on July 17, 2020.

4. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the court shall order the forfeiture of any other property of the defendants, up to the value of any property described in paragraph 2 if, by any act or omission of the defendants, the property described in paragraph 2, or any portion thereof:

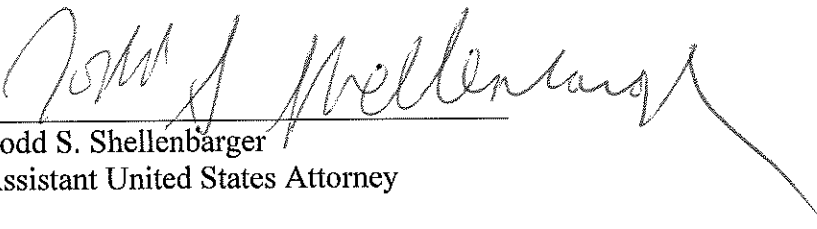
- A. cannot be located upon the exercise of due diligence;
- B. has been transferred or sold to, or deposited with, a third party;
- C. has been placed beyond the jurisdiction of the court;
- D. has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty.

A TRUE BILL:



JOHN E. CHILDRESS
Acting United States Attorney

by:



Todd S. Shellenbarger
Assistant United States Attorney