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UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

January 2025 Grand Jury

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
SHIRZAD MEHRRAFIEE,  
aka "Shirzad Rafiee," and  
MAHDI RAJABI,  
  
Defendants.

CR **2:25-CR-00126-CV**

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy to Conduct an Unlicensed Money Transmitting Business;  
18 U.S.C. § 1349: Conspiracy to Commit Wire Fraud;  
18 U.S.C. § 1343: Wire Fraud;  
18 U.S.C. § 1344(1): Bank Fraud; and  
18 U.S.C. § 981(a)(1)(C), 18 U.S.C. § 982 and 28 U.S.C. § 2461(c): Criminal Forfeiture]

The Grand Jury charges:

COUNT ONE

[18 U.S.C. § 371]

[ALL DEFENDANTS]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendants SHIRZAD MEHRRAFIEE, also known as "Shirzad Rafiee," and MAHDI RAJABI were present and resided in the Central District of California.

1           2.     Neither MEHRRAFIEE nor RAJABI, nor any entity through which  
2 they were operating, were registered as a money services business  
3 under federal laws and regulations or as a money transmitter under  
4 the laws and regulations of the State of California.

5           B.     OBJECT OF THE CONSPIRACY

6           Beginning on a date unknown, but no later than January 2020, and  
7 continuing through at least February 6, 2025, in Los Angeles County,  
8 within the Central District of California, and elsewhere, defendants  
9 MEHRRAFIEE and RAJABI, and others known and unknown to the Grand  
10 Jury, conspired and agreed with each other to knowingly conduct,  
11 control, manage, supervise, direct, and own an unlicensed money  
12 transmitting business affecting interstate and foreign commerce,  
13 which (1) was operated without an appropriate money transmitting  
14 license in California, where such operation is punishable as a felony  
15 under state law, and (2) failed to comply with the money transmitting  
16 business registration requirements under Title 31, United States  
17 Code, Section 5330, and the regulations thereunder, all in violation  
18 of Title 18, United States Code, Sections 1960(a), (b)(1)(A), and  
19 (b)(1)(B).

20           C.     MANNER AND MEANS OF THE CONSPIRACY

21           3.     The object of the conspiracy was to be accomplished, in  
22 substance, as follows:

23           a.     Defendants MEHRRAFIEE and RAJABI, together and working  
24 with others, would receive and transmit funds in the form of wire  
25 transmissions, checks, and large amounts of U.S. currency on behalf  
26 of other people. Defendant RAJABI would also operate a social media  
27 platform where he advertised an ability to transfer money to and from  
28 Iran on behalf of customers.

1           b. Defendants MEHRRAFIEE and RAJABI would communicate  
2 about exchanging large amounts of U.S. currency, including  
3 communicating through encrypted messaging applications.

4           c. Defendant RAJABI would deliver large quantities of  
5 U.S. currency to defendant MEHRRAFIEE so that defendant MEHRRAFIEE  
6 could arrange for the funds to be deposited into bank accounts in the  
7 United States.

8           d. After receiving large amounts of cash from co-  
9 conspirators, including defendant RAJABI, defendant MEHRRAFIEE would  
10 deposit the cash into bank accounts in the United States that  
11 defendant MEHRRAFIEE controlled.

12           e. Defendant MEHRRAFIEE would receive wire transfers and  
13 deposit checks and cash into, among other places, a bank account  
14 ending in x2866 under the entity name Advaa at Bank-1 (the "Advaa  
15 Bank Account"); a bank account ending in x2908 under the entity name  
16 American Golden Brokers (the "AGB Bank Account"); and a bank account  
17 ending in x2916 under the entity name I Concert Entertainment Inc.  
18 (the "I Concert Bank Account") (together, the "Money Transmitting  
19 Bank Accounts").

20           f. After taking a percentage of the transaction value as  
21 profit, defendant MEHRRAFIEE would disburse money to others, including  
22 by issuing checks from the Money Transmitting Bank Accounts, and  
23 other accounts controlled by defendant MEHRRAFIEE, and through  
24 substantial cash withdrawals from the Money Transmitting Bank  
25 Accounts.

26           4. Between in or about January 2020 and in or about November  
27 2024, defendant MEHRRAFIEE caused withdrawals of cash and wrote  
28 checks worth a total of over \$46 million from the Money Transmitting

1 Bank Accounts on behalf of co-conspirators and/or customers of  
2 defendant MEHRRAFIEE's illegal money transmitting business.

3 D. OVERT ACTS

4 On or about the following dates, in furtherance of the  
5 conspiracy and to accomplish its object, defendants MEHRRAFIEE and  
6 RAJABI, and others known and unknown to the Grand Jury, committed  
7 various overt acts within the Central District of California, and  
8 elsewhere, including, but not limited to, the following:

9 Overt Act No. 1: On March 7, 2024, after defendant RAJABI  
10 asked whether defendant MEHRRAFIEE would send a wire transfer to  
11 another individual, defendant MEHRRAFIEE responded that wires were a  
12 headache because banks report wires to the back office and the FBI,  
13 among others, so defendant MEHRRAFIEE felt it was better to deposit  
14 directly into the account, *i.e.*, transfer money by check.

15 Overt Act No. 2: On March 9, 2024, defendant RAJABI informed  
16 defendant MEHRRAFIEE that he knew a person in Mashhad, Iran, who  
17 would give defendant RAJABI money in Tehran, Iran for the purpose of  
18 completing a parallel escrow payment in the United States. Defendant  
19 RAJABI asked if defendant MEHRRAFIEE could assist with the  
20 transaction.

21 Overt Act No. 3: On March 9, 2024, in response to the  
22 communications referenced in Overt Act No. 2, defendant MEHRRAFIEE  
23 told defendant RAJABI that he could do the transaction but that the  
24 person in Tehran would need to have U.S. dollars.

25 Overt Act No. 4: On March 9, 2024, defendant RAJABI sent  
26 defendant MEHRRAFIEE English-language escrow instructions from a  
27 particular escrow company ("Escrow Company-1") and indicated the  
28 payment would be \$36,100.

1           Overt Act No. 5:       On March 9, 2024, defendant RAJABI confirmed  
2 to defendant MEHRRAFIEE that their Iranian customer agreed to deliver  
3 the money to a co-conspirator in Tehran, Iran, the following day.

4           Overt Act No. 6:       On March 10, 2024, in response to defendant  
5 RAJABI asking for the phone number of defendant MEHRRAFIEE's contact  
6 in Iran and indicating that the money delivery would happen on March  
7 11, 2024, defendant MEHRRAFIEE sent defendant RAJABI certain  
8 information for his Iranian contact.

9           Overt Act No. 7:       On March 12, 2024, defendant MEHRRAFIEE  
10 caused a wire transfer of \$36,100 from the I Concert Bank Account to  
11 Escrow Company-1.

12           Overt Act No. 8:       On September 24, 2024, defendants MEHRRAFIEE  
13 and RAJABI communicated about a money transmitting transaction in the  
14 amount of \$40,441, which included defendant RAJABI asking for a  
15 photograph of the money transfer in order to show it to another co-  
16 conspirator.

17           Overt Act No. 9:       On September 24, 2024, defendant MEHRRAFIEE  
18 sent defendant RAJABI a photograph depicting banking information  
19 showing checks paid in the amount of \$40,441.

20           Overt Act No. 10:     On September 24, 2024, defendant MEHRRAFIEE  
21 and defendant RAJABI met at a gas station in Encino, California,  
22 where defendant RAJABI handed defendant MEHRRAFIEE a bag containing  
23 United States currency.

24           Overt Act No. 11:     On September 24, 2024, after receiving U.S.  
25 currency from defendant RAJABI, defendant MEHRRAFIEE traveled to a  
26 Bank-1 branch in Encino, California, where he entered the bank branch  
27 carrying the bag he received from defendant RAJABI.

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1           Overt Act No. 12:    On September 24, 2024, defendant MEHRRAFIEE  
2 deposited approximately \$380,100 in cash into the Advaa Bank Account,  
3 and left the Bank-1 branch not carrying the bag he received from  
4 defendant RAJABI and instead carrying only a piece of paper.

5           Overt Act No. 13:    On February 6, 2025, defendant RAJABI  
6 traveled to a parking lot in Woodland Hills, California, to pick up  
7 approximately \$150,000 in currency from another person.

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COUNT TWO

[18 U.S.C. § 1349]

[DEFENDANT MEHRRAFIEE]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Indictment:

1. Defendant SHIRZAD MEHRRAFIEE, also known as "Shirzad Rafiee," resided in and conducted business from the Central District of California.

2. The Coronavirus Aid, Relief, and Economic Security ("CARES") Act was a federal law enacted in or about March 2020 that was designed to provide emergency financial assistance to Americans suffering economic harm as a result of the COVID-19 pandemic.

3. The Economic Injury Disaster Loan Program ("EIDL") was a United States Small Business Administration ("SBA") program that provided low-interest financing to small businesses, renters, and homeowners in regions affected by declared disasters.

4. The CARES Act authorized the SBA to provide EIDL loans of up to \$2 million to eligible small businesses experiencing substantial financial disruption due to the COVID-19 pandemic.

5. To obtain an EIDL loan, a qualifying business was required to submit an application to the SBA and provide information about the business's operations, such as the number of employees, gross revenues for the 12-month period preceding the disaster, and cost of goods sold in the 12-month period preceding the disaster. In the case of EIDL loans for COVID-19 relief, the 12-month period was the 12-month period from January 31, 2019, to January 31, 2020. The applicant was also required to certify that all of the information in

1 the application was true and correct to the best of the applicant's  
2 knowledge.

3 6. EIDL loan applications were submitted directly to the SBA  
4 and processed by the agency with support from a government  
5 contractor. The amount of the loan, if the application was approved,  
6 was determined in part based on the information provided by the  
7 applicant about employment, revenue, and cost of goods sold. Any  
8 funds issued under an EIDL loan were issued directly by the SBA.

9 7. EIDL loan funds could be used for payroll expenses, sick  
10 leave, production costs, and business obligations of the applicant  
11 entity, such as debts, rent, and mortgage payments. Borrowers, as  
12 part of the EIDL loan application, certified that they would use loan  
13 proceeds "solely as working capital to alleviate economic injury  
14 caused by disaster occurring in the month of January 31, 2020 and  
15 continuing thereafter."

16 B. THE OBJECT OF THE CONSPIRACY

17 Beginning on or about June 27, 2020, and continuing until on or  
18 about December 31, 2020, in Los Angeles County, within the Central  
19 District of California, and elsewhere, defendant MEHRRAFIEE knowingly  
20 conspired with others known and unknown to the Grand Jury to commit  
21 wire fraud, in violation of Title 18, United States Code, Section  
22 1343.

23 C. THE MANNER AND MEANS OF THE CONSPIRACY

24 8. The object of the conspiracy was carried out, and was to be  
25 carried out, in substance, as follows:

26 a. Defendant MEHRRAFIEE and co-conspirators would submit  
27 and cause to be submitted false and fraudulent applications to the  
28 SBA for EIDL loans on behalf of purported sole proprietorship

1 businesses operated in the name of their respective owners (the  
2 "Alias EIDL Applications"), including the following:

EIDL Loan Applicant	Date Loan Application Submitted
Individual R.B.	6/27/2020
Individual A.S.	6/29/2020
Individual A.T.	6/29/2020
Individual S.D.	6/30/2020
Individual I.K.	6/30/2020
Individual T.S.	6/30/2020
Individual P.P.	7/1/2020
Individual A.C.	7/6/2020
Individual I.A.	7/7/2020
Individual A.B.	7/8/2020
Individual S.P.	7/14/2020
Individual O.K.	7/15/2020
Individual K.A.	7/15/2020
Individual A.D.	7/15/2020
Individual S.S.	7/15/2020
Individual D.B.	7/17/2020
Individual E.J.	7/20/2020

22 b. In the Alias EIDL Applications, one or more  
23 conspirators would cause the submission of fraudulent EIDL loan  
24 applications containing materially false statements, representations,  
25 promises, and omissions, including: misrepresenting the location of  
26 the purported business, misrepresenting the purpose of the funds,  
27 misrepresenting the true applicant for the EIDL, and misrepresenting  
28 the operation of the business entity listed in the EIDL application.

1 c. In connection with the Alias EIDL Applications,  
2 conspirators would provide the SBA with bank account information into  
3 which loan funds could be disbursed.

4 d. Defendant MEHRRAFIEE would exchange messages with co-  
5 conspirators regarding the fraudulent loan applications and  
6 disbursements.

7 e. After the SBA disbursed loan funds into bank accounts  
8 set up in the name of each purported applicant, conspirators,  
9 including defendant MEHRRAFIEE, would empty those bank accounts of  
10 funds, including by defendant MEHRRAFIEE writing checks made out to  
11 "cash" and/or other business entities he controlled.

12 D. OVERT ACTS

13 On or about the following dates, in furtherance of the  
14 conspiracy and to accomplish its object, defendant MEHRRAFIEE, and  
15 others known and unknown to the Grand Jury, committed various overt  
16 acts within the Central District of California, and elsewhere,  
17 including, but not limited to, the following:

18 Overt Act No. 1: On July 6, 2020, a co-conspirator caused,  
19 through the submission of a fraudulent EIDL loan application, the SBA  
20 to disburse approximately \$8,000 in EIDL advance funds into a bank  
21 account in the name of Individual P.P. (the "Individual P.P. Bank  
22 Account"). Prior to the wire transfer, the Individual P.P. Bank  
23 Account contained \$0.

24 Overt Act No. 2: On July 13, 2020, a co-conspirator caused,  
25 through the submission of a fraudulent EIDL loan application, the SBA  
26 to disburse approximately \$149,900 in EIDL funds into the Individual  
27 P.P. Bank Account.

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1           Overt Act No. 3:       On July 7, 2020, a co-conspirator caused,  
2 through the submission of a fraudulent EIDL loan application, the SBA  
3 to disburse approximately \$149,900 in EIDL funds into a bank account  
4 in the name of Individual I.K (the "Individual I.K. Bank Account").  
5 Prior to the wire transfer, the Individual I.K. Bank Account  
6 contained \$0.

7           Overt Act No. 4:       On July 7, 2020, a co-conspirator caused,  
8 through the submission of a fraudulent EIDL loan application, the SBA  
9 to disburse approximately \$149,900 in EIDL funds into a bank account  
10 in the name of Individual I.K (the "Individual I.K. Bank Account").  
11 Prior to the wire transfer, the Individual I.K. Bank Account  
12 contained \$0.

13           Overt Act No. 5:       On July 21, 2020, a co-conspirator caused,  
14 through the submission of a fraudulent EIDL loan application, the SBA  
15 to disburse approximately \$149,900 in EIDL funds into a bank account  
16 in the name of Individual O.K (the "Individual O.K. Bank Account").  
17 Prior to the wire transfer, the Individual O.K. Bank Account  
18 contained \$0.

19           Overt Act No. 6:       On August 19, 2020, a co-conspirator wrote a  
20 check for \$24,000 drawn from the Individual I.K. Bank Account to  
21 cash, which, after several checks were already issued from the  
22 Individual I.K. Bank Account, left only \$1,047 in the account.

23           Overt Act No. 7:       On August 24, 2020, a co-conspirator ("Co-  
24 Conspirator-1") messaged defendant MEHRRAFIEE to ask if Individual  
25 I.K. was done.

26           Overt Act No. 8:       On August 24, 2020, in response to the text  
27 messages referenced in Overt Act No. 7, defendant MEHRRAFIEE  
28 responded to Co-Conspirator-1, "yes sir."

1           Overt Act No. 9:       On September 1, 2020, a co-conspirator wrote  
2 a check for \$28,000 drawn from the Individual P.P. Bank Account to  
3 "American Golden," which, after several checks were already issued  
4 from the Individual P.P. Bank Account, left only \$9,157 in the  
5 account.

6           Overt Act No. 10:   On September 10, 2020, Co-Conspirator-1  
7 messaged defendant MEHRRAFIEE asking "[d]id you do [Individual  
8 P.P.][?]" and stating "[l]ast transaction is showing Sept 02 for  
9 \$28k."

10          Overt Act No. 11:   On September 14, 2020, Co-Conspirator-1  
11 messaged defendant MEHRRAFIEE with a list of first names, last  
12 initials, and dollar amounts, including "[Individual O.K.] 53k," and  
13 "[Individual S.S.] \$88k," and adding "These r getting close. Can u  
14 finish them by next week?"

15          Overt Act No. 12:   On September 14, 2020, in response to the  
16 messages referenced in Overt Act No. 11, defendant MEHRRAFIEE  
17 responded to Co-Conspirator-1, "Oh yes for sure."

18          Overt Act No. 13:   On September 14, 2020, Co-Conspirator-1  
19 messaged defendant MEHRRAFIEE to say "Bro did u do the \$10k for  
20 [Individual O.K.] cause it's still not showing?"

21          Overt Act No. 14:   On September 14, 2020, defendant MEHRRAFIEE  
22 responded to the text messages referenced in Overt Act No. 13 by  
23 saying "Yes bro" and "It will show tomorrow."

24          Overt Act No. 15:   On September 15, 2020, a co-conspirator  
25 wrote a check for \$10,000 drawn from the Individual O.K. Bank Account  
26 to American Golden, which, after several checks were already issued  
27 from the Individual O.K. Bank Account, left only \$895 in the account.

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COUNT THREE

[18 U.S.C. §§ 1343, 2(a)]

[DEFENDANT MEHRRAFIEE]

The Grand Jury re-alleges here Paragraph 1 of Count One and Paragraphs 2-7 of Count Two of this Indictment.

A. THE SCHEME TO DEFRAUD

1. Beginning on or about March 30, 2020, and continuing until at least on or about February 15, 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant SHIRZAD MEHRRAFIEE, also known as "Shirzad Rafiee," together with others known and unknown to the Grand Jury, each aiding and abetting the other, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud victims as to material matters, and to obtain money and property from the victims by means of materially false and fraudulent pretenses, representations, and promises, and the concealment of material facts.

2. The fraudulent scheme operated and was carried out, in substance, as follows:

3. Defendant MEHRRAFIEE submitted to the SBA an EIDL application on behalf of I Concert Entertainment LLC (the "I Concert EIDL Application"), a company that defendant MEHRRAFIEE controlled.

4. In the I Concert EIDL Application, defendant MEHRRAFIEE made and caused to be made materially false statements, representations to, and promises, and concealed material facts from, the SBA in connection with obtaining EIDL loan funds for the business, including defendant MEHRRAFIEE answering "no" to a question asking whether defendant MEHRRAFIEE had ever been convicted of, or pleaded guilty to, any criminal offense except a minor vehicle

1 violation. At the time defendant MEHRRAFIEE completed and submitted  
2 the I Concert EIDL Application, he knew that he sustained a felony  
3 conviction in 2007 for conspiracy to commit bank fraud, in violation  
4 of Title 18, United States Code, Section 1349, for which he was  
5 sentenced to 24 months' imprisonment and five years of supervised  
6 release.

7 5. Based on defendant MEHRRAFIEE's submission of the I Concert  
8 EIDL Application, the SBA disbursed a loan in the amount of \$150,000

9 6. Defendant MEHRRAFIEE later submitted a loan modification  
10 request to increase the amount of the loan granted by the SBA, which  
11 resulted in the SBA disbursing an additional \$350,000 in loan funds.

12 B. THE USE OF THE WIRES

13 7. On or about March 30, 2024, in Los Angeles County, within  
14 the Central District of California, and elsewhere, defendant  
15 MEHRRAFIEE, for the purpose of executing the above-described scheme  
16 to defraud, transmitted and caused the transmission by means of a  
17 wire communication in interstate commerce an electronic  
18 communication, namely, the submission of the I Concert EIDL  
19 Application from the Central District of California to a server  
20 outside the State of California.

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COUNT FOUR

[18 U.S.C. § 1344(1)]

[DEFENDANT MEHRRAFIEE]

The Grand Jury re-alleges here Paragraph 1 of Count One of this Indictment.

A. INTRODUCTORY ALLEGATIONS

1. Bank-2 operated in the Central District of California, and elsewhere, and is a mortgage lending business.

B. THE SCHEME TO DEFRAUD

2. In or about June 2021, in Los Angeles County, within the Central District of California, and elsewhere, defendant SHIRZAD MEHRRAFIEE, also known as "Shirzad Rafiee," together with others known and unknown to the Grand Jury, knowingly and with intent to defraud, devised, participated in, and executed a scheme to defraud Bank-2, as to material matters.

3. The fraudulent scheme operated, in substance, in the following manner:

a. On or about June 28, 2021, defendant MEHRRAFIEE applied for a home mortgage loan with Bank-2.

b. As part of the loan application process, defendant MEHRRAFIEE submitted bank statements for one of his purported businesses, I Concert Entertainment LLC. The bank statements purported to be from an account at Bank-1 in the name of I Concert Entertainment LLC with an account ending in 6164 (the "I Concert Entertainment Account").

c. In connection with the mortgage application, defendant MEHRRAFIEE submitted fraudulent bank statements related to the I Concert Entertainment Account for the period from January 2021 to

1 April 2021 that had been manipulated and altered to significantly  
2 overstate defendant MEHRRAFIEE's income and assets in the account.

3 C. EXECUTION OF THE SCHEME

4 4. On or about June 28, 2021, in Los Angeles County, within  
5 the Central District of California, defendant MEHRRAFIEE, together  
6 with others known and unknown to the Grand Jury, executed the  
7 fraudulent scheme described above by submitting to Bank-2 false and  
8 fraudulent bank statements related to the I Concert Entertainment  
9 Account in support of his mortgage loan application.

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FORFEITURE ALLEGATION ONE

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1 Pursuant to Rule 32.2 of the Federal Rules of Criminal  
2 Procedure, notice is hereby given that the United States of America  
3 will seek forfeiture as part of any sentence, pursuant to Title 18,  
4 United States Code, Section 981(a)(1)(C) and Title 28, United States  
5 Code, Section 2461(c), in the event of any defendant's conviction of  
6 the offenses set forth in any of Counts One through Three of this  
7 Indictment.  
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9  
10 2. Any defendant so convicted shall forfeit to the United  
11 States of America the following:

12 (a) all right, title, and interest in any and all  
13 property, real or personal, constituting, or derived from, any  
14 proceeds traceable to the offenses; and

15 (b) To the extent such property is not available for  
16 forfeiture, a sum of money equal to the total value of the property  
17 described in subparagraph (a).

18 3. Pursuant to Title 21, United States Code, Section 853(p),  
19 as incorporated by Title 28, United States Code, Section 2461(c), any  
20 defendant so convicted shall forfeit substitute property, up to the  
21 value of the property described in the preceding paragraph if, as the  
22 result of any act or omission of said defendant, the property  
23 described in the preceding paragraph or any portion thereof (a)  
24 cannot be located upon the exercise of due diligence; (b) has been  
25 transferred, sold to, or deposited with a third party; (c) has been  
26 placed beyond the jurisdiction of the court; (d) has been  
27 substantially diminished in value; or (e) has been commingled with  
28 other property that cannot be divided without difficulty.

FORFEITURE ALLEGATION TWO

[18 U.S.C. § 982]

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3 1. Pursuant to Rule 32.2(a) of the Federal Rules of Criminal  
4 Procedure, notice is hereby given that the United States of America  
5 will seek forfeiture as part of any sentence, pursuant to Title 18,  
6 United States Code, Section 982(a)(2), in the event of the  
7 defendant's conviction of the offense set forth in Count Four of this  
8 Indictment.

9 2. The defendant, if so convicted, shall forfeit to the United  
10 States of America the following:

11 (a) All right, title and interest in any and all property,  
12 real or personal, constituting, or derived from, any proceeds  
13 obtained, directly or indirectly, as a result of the offense; and

14 (b) To the extent such property is not available for  
15 forfeiture, a sum of money equal to the total value of the property  
16 described in subparagraph (a).

17 3. Pursuant to Title 21, United States Code, Section 853(p), as  
18 incorporated by Title 18, United States Code, Section 982(b), the  
19 defendant, if so convicted, shall forfeit substitute property, up to  
20 the total value of the property described in the preceding paragraph  
21 if, as the result of any act or omission of the defendant, the  
22 property described in the preceding paragraph, or any portion  
23 thereof: (a) cannot be located upon the exercise of due diligence;  
24 (b) has been transferred, sold to or deposited with a third party;

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1 (c) has been placed beyond the jurisdiction of the court; (d) has  
2 been substantially diminished in value; or (e) has been commingled  
3 with other property that cannot be divided without difficulty.  
4

5 A TRUE BILL

6  
7 /s/  
8 Foreperson

9 JOSEPH T. MCNALLY  
Acting United States Attorney

10 

11  
12 DAVID T. RYAN  
Assistant United States Attorney  
Chief, National Security Division

13  
14 IAN V. YANNIELLO  
Assistant United States Attorney  
Chief, Terrorism and Export  
15 Crimes Section

16  
17 KEDAR S. BHATIA  
Assistant United States Attorney  
Terrorism and Export Crimes  
18 Section