

b. Title 18, United States Code, Section 981(a)(1)(G) and Title 28, United States Code, Section 2461(c), which require the forfeiture of all assets, foreign or domestic:

i. of any individual, entity, or organization engaged in planning or perpetrating any federal crime of terrorism against the United States, citizens or residents of the United States, or their property, and all assets, foreign or domestic, affording any person a source of influence over any such entity or organization;

ii. acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing any federal crime of terrorism against the United States, citizens or residents of the United States, or their property;

iii. derived from, involved in, or used or intended to be used to commit any federal crime of terrorism against the United States, citizens or residents of the United States, or their property; or

iv. of any individual, entity, or organization engaged in planning or perpetrating any act of international terrorism against any international organization or against any foreign government.

2. The violation of Title 18, United States Code, Section 2339B alleged in Count Eight of this Indictment is a federal crime of terrorism, as defined in Title 18, United States Code, Section 2332b(g)(5), against the United States, citizens and residents of the United States and their property.

3. If any of the above-described forfeitable property, as a result of any act or omission of MAHDE DANNON and MOYAD DANNON, the defendants:

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 has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and (G); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c)).

A TRUE BILL:



FOR PERSON

JOSH J. MINKLER
United States Attorney

By:



Matthew J. Rinka
Assistant United States Attorney
Deputy Criminal Chief, National Security Unit