

FORFEITURE ALLEGATION

The SPECIAL FEBRUARY 2016 GRAND JURY alleges:

1. The allegations contained in Counts One through Three of this indictment are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

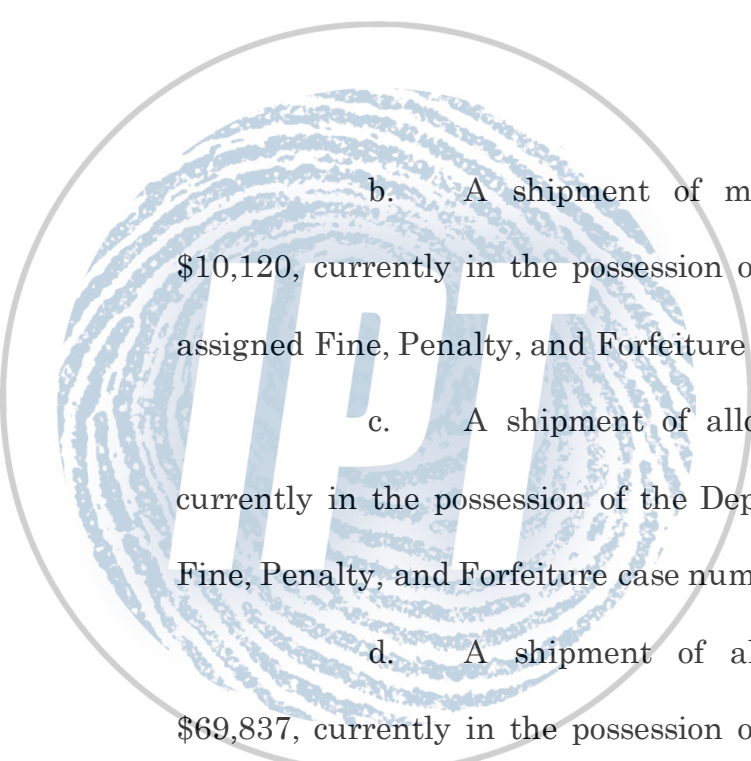
2. As a result of his violations of Title 18, United States Code, Section 1343, as alleged in the foregoing indictment,

SAEED VALADBAIGI,
also known as “Saeed Valad” and “Saeed Baigi,”

defendant herein, shall forfeit to the United States: any and all right, title, and interest he may have in property, real and personal, which constitutes and is derived from proceeds traceable to the charged offenses, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

3. The interests of the defendant subject to forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), include but are not limited to:

a. A shipment of alloy bars, valued at approximately \$16,473, currently in the possession of the Department of Homeland Security and assigned Fine, Penalty, and Forfeiture case number 2008390100032501;



b. A shipment of magnesium plates, valued at approximately \$10,120, currently in the possession of the Department of Homeland Security and assigned Fine, Penalty, and Forfeiture case number 2008390100031301;

c. A shipment of alloy ingots, valued at approximately \$61,540, currently in the possession of the Department of Homeland Security and assigned Fine, Penalty, and Forfeiture case number 2009520100012401; and

d. A shipment of aluminum sheets, valued at approximately \$69,837, currently in the possession of the Department of Homeland Security and assigned Fine, Penalty, and Forfeiture case number 2008390100046001.

All pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY