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35. Upon conviction of the offenses alleged in Counts One through Thirty Four of this Indictment, defendant shall forfeit to the United States any property, real or personal, which constitutes, or is derived from proceeds traceable to the this offense, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c). The property subject to forfeiture includes a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, which constitutes, or is derived from proceeds traceable to the this offense.

36. Upon conviction of the offense alleged in Count Thirty Four of this Indictment, defendant shall forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property pursuant to Title 18, United States Code, Section 982(a)(1). The property subject to forfeiture includes a forfeiture money judgment for a sum of money equal to the value of any property, real or personal, involved in the violation, and any property traceable to such property.

37. If any of the property described above as being subject to forfeiture, 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 that cannot be divided without difficulty;

the defendant shall forfeit to the United States any other property of the defendant, up to the value of the property described above, pursuant to Title 21, United States Code, Section 853(p).

**(Criminal Forfeiture,** pursuant to Title 18, United States Code, Section 981(a)(1)(C), Title 28, United States Code, Section 2461(c), Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853(p)).

A TRUE BILL

FOREPERSON

Attorney of the United States in  
and for the District of Columbia