

- a. All of his assets, foreign or domestic (18 U.S.C. §§ 981(a)(1)(G)(i) and (iv) and 28 U.S.C. § 2461(c));\
- b. All assets acquired or maintained by any person with the intent and for the purpose of supporting, planning, conducting, or concealing the offense charged in Count One of this Indictment (18 U.S.C. § 981(a)(1)(G)(ii) and 28 U.S.C. § 2461(c));
- c. All assets derived from, involved in, or used or intended to be used to commit the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(G)(iii) and 28 U.S.C. § 2461(c)); and
- d. Any property, real or personal, which constitutes or is derived from proceeds traceable to the offense charged in Count One of the Indictment (18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)).

Such assets include, but are not limited to: (1) \$500 in U.S. currency the defendant provided to a person on December 14, 2019; and (2) items seized from the defendant on December 15, 2019, including (a) \$500 in U.S. currency; (b) three \$100 Amazon gift cards; (c) Axon ZTE cellular telephone, Model ZTE-b20176; (d) Blackberry DTEK60; (e) ASUS micro storage device (thumb drive); and (f) Seagate 2000GB Hard Drive, SN-Z1E0KZ33.

All in accordance with Title 18 U.S.C. § 981(a)(1)(G), 28 U.S.C. § 2461(c), 21 U.S.C. § 853, and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/s/

FOREPERSON


LEONARD C. BOYLE
FIRST ASSISTANT UNITED STATES ATTORNEY


DOUGLAS P. MORABITO
ASSISTANT UNITED STATES ATTORNEY


JUSTIN SHER
TRIAL ATTORNEY
UNITED STATES DEPARTMENT OF JUSTICE