

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF IOWA  
CEDAR RAPIDS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIAM B. AOSSEY, JR.,

Defendant.

No. 14-CR-00116-LRR

**Count 1**

18 U.S.C. § 371

Conspiracy to: Make and Use  
Materially False Statements and  
Documents; Sell Misbranded  
Meat; and Commit Mail and Wire  
Fraud

**Counts 2 - 8**

21 U.S.C. § 611

False Statements on Export  
Certificates

**Counts 9 - 15**

18 U.S.C. § 1341

Wire Fraud

**Wire Fraud Forfeiture Allegation**

**Counts 16 - 18**

18 U.S.C. § 1957(a)

Money Laundering

**Count 19**

18 U.S.C. § 1956(h)

Money Laundering Conspiracy

**Money Laundering Forfeiture**

**Allegation**

PRESENTED IN OPEN COURT  
BY THE  
FOREMAN OF THE GRAND JURY  
And filed 10/23/2014  
ROBERT L. PHELPS, CLERK

## INDICTMENT

The Grand Jury charges:

### A. Introduction

At all times relevant to this Indictment:

#### United States Department of Agriculture (USDA)

1. The USDA Food Safety and Inspection Service (FSIS) was the public health agency within USDA responsible for ensuring that beef products were safe, wholesome, and accurately labeled.

2. USDA Agriculture Marketing Service (AMS) was the division of USDA responsible for verifying that beef originating in the United States met certain standards and regulations established by the USDA and by each country that imported beef products from the United States. AMS maintained an online database that was to be used by FSIS inspectors and exporters to verify that each shipment of beef intended for export from the United States was properly labeled and eligible to be exported to the designated country.

3. In order to fulfill its regulatory and oversight responsibilities, the USDA depended upon exporters to accurately label, mark, and brand their beef products intended for export from the United States. This included the requirement that all exterior beef product packaging and product labels contain a USDA establishment number to accurately reflect the source of the products.

4. In addition, certain documents were required to be accurately completed to attest to: the identity of the USDA establishment from where the meat originated; the wholesomeness of the meat; and to provide other information required to assist the USDA in ensuring that the meat was fit for consumption and eligible to be exported to the designated importing country.

5. Among the specific documents required by the USDA to be accurately completed in order for beef to be eligible for export from the United States were an "Application for Export Certificate," FSIS Form 9060-6; a so-called "Export Certificate," FSIS Form 9060-5; and a "Letterhead Certificate," FSIS Form 2630-9.

6. In addition, all labels attached to or contained within beef product packages shipped for export from the United States were required, prior to their use, to be approved by USDA for content, and to ensure that any label or ink that may come in contact with the beef would not contaminate the beef.

Midamar Corporation

7. Midamar Corporation (Midamar) was incorporated as a business in the State of Iowa and operated out of its headquarters at 1105 60<sup>th</sup> Ave S.W., Cedar Rapids, Iowa.

8. Midamar's Corporate directors, as reflected in filings with the Iowa Secretary of State, were defendant, WILLIAM B. AOSSEY, Jr. (Midamar's founder); "J.A." and "W. "Y" A." (defendant's sons); and "J. S."



9. Midamar was in the business of selling and distributing food products throughout the world. Midamar marketed its products as meeting the strictest “Halal” beef slaughtering standards.

Foreign Country Requirements

10. Malaysia and Indonesia restricted the import of Halal beef to products that had been certified by a specifically approved certifying entity.

11. In addition to the above requirement, (by at least May of 2008) Indonesia and Malaysia each restricted the import of Halal beef products to those products that had been slaughtered at a facility specifically approved by each respective country.

12. In order for beef products to have been eligible for export from the United States, the shipment must also have complied with any restrictions imposed by the importing country.

13. It was incumbent upon the beef exporter to ensure that the beef product was eligible for export to the intended importing country. Therefore, the exporter was required to truthfully and accurately complete FSIS Form 9060-6, “Application for Export Certificate,” which was to include a specification of all products contained in the shipment and a certification that the products met the import requirements of the importing country. The completed form was to be presented by the exporter to an FSIS inspector for approval and signature.

14. Upon approval of the Export Certificate Application by FSIS, the exporter was to truthfully and accurately complete the Export Certificate applicable to the importing country and have that certificate approved by the appropriate official (typically a USDA veterinarian or another government official), as designated by the importing country.

15. When a shipment had been properly coded and authorized for export, AMS would issue a certificate (Audit, Review, and Compliance Form 1030 (Form 1030)) to verify to the exporter and to FSIS that the shipment had been authorized. This certificate was to accompany the shipment to the export destination. AMS charged exporters a fee for this Export Verification (EV) service and for the issuance of each EV certificate.

Islamic Services of America

16. Islamic Services of America (ISA) was incorporated as a business in the State of Iowa and operated out of its headquarters at 1105 60<sup>th</sup> Ave S.W., Cedar Rapids, Iowa.

17. ISA's corporate filings with the State of Iowa listed defendant, WILLIAM B. AOSSEY, JR., as a Director; J.A. as the Registered Agent and Secretary; and W."Y"A. as the President and Treasurer.

18. ISA was in the business of certifying food products as Halal for customers throughout the world.

19. ISA was one of the few organizations approved by Malaysia and Indonesia to certify Halal beef for import into those countries.

20. ISA would inspect and certify beef slaughter or processing facilities on a periodic basis for purposes of determining whether the facility could be approved for Halal slaughter or processing. If approved, ISA would issue the facility a certificate of approval for display by the approved facility.

21. ISA would typically generate several documents for beef products, including: a certificate of origin to accompany the product from the ISA-certified slaughter facility to any subsequent processor; a "Certificate of Islamic Slaughter" (also called a "Halal Export Certificate") to accompany products intended to be exported from the United States; and a so-called "Health Certificate," also intended to accompany exports. ISA's logo was also placed on the boxes and packages containing the purported Halal beef that originated from an ISA certified facility.

22. The certificates and other documents completed by ISA, along with the ISA logo placed on boxes or other packaging, were intended by ISA to attest that the beef had been slaughtered and processed at the facility noted on each certificate, in accordance with the standards represented by ISA, and in compliance with the distinct requirements of each country by whom ISA was recognized as an approved Halal certifier, and to where the ISA certified beef was



to be exported.

Tri-Bin, Inc.

23. Tri-Bin, Inc., (Tri-Bin), owns the land and building located at 1105 60th Avenue S.W., the corporate offices and warehouse of Midamar Corporation. ISA's office was also located in the same building. Midamar issued checks to Tri-Bin on a monthly basis that included rent payments for its operating location. Tri-Bin is owned by defendant, WILLIAM B. AOSSEY, JR.

PM

24. PM operated a beef slaughter and production facility in Windom, Minnesota.

25. PM operated under United States Department of Agriculture (USDA) establishment number 683.

26. PM was not certified by Malaysia or Indonesia to export beef products to either country. Without such certification PM products were not authorized to be imported into either country.

O.P.C., Inc.

27. O.P.C. operated a beef slaughter and production facility in Omaha, Nebraska. O.P.C. provided custom beef slaughter services for both religious and non-religious slaughter customers.

28. O.P.C. operated under United States Department of Agriculture (USDA) establishment number 889A.

29. O.P.C. occasionally slaughtered and processed beef for Midamar but did not do so between about the middle of July 2007 through about April 2010.

30. O.P.C. was approved by both Malaysia and Indonesia to export beef to those countries between at least July 2007 and 2010, but O.P.C. did not sell any beef to Midamar during that time.

**COUNT 1**

**Conspiracy to Make and Use Materially False Statements  
and Documents; Sell Misbranded Meat; and  
Commit Mail and Wire Fraud**

31. Paragraphs 1-30 of this Indictment are incorporated by this reference as if fully set forth here.

32. Beginning in about 2007, and continuing into at least 2010, defendant, WILLIAM B. AOSSEY, JR., did knowingly and unlawfully conspire and agree with other persons known to the grand jury, to commit the following violations of law:

- 1) in a matter within the jurisdiction of the Department of Agriculture, to cover up material facts by a scheme; in violation of Title 18, United States Code, Section 1001;
- 2) in a matter within the jurisdiction of the Department of Agriculture, to make false and fraudulent statements and representations, in violation of Title 18, United States Code, Section 1001;
- 3) in a matter within the jurisdiction of the Department of Agriculture, to make and use false documents in violation of Title 18, United States Code, Section 1001;



- 4) to sell in commerce articles that had been misbranded, in violation of Title 21, United States Code, Section 610;
- 5) to make false statements on export certificates, in violation of Title 21, United States Code, Section 611;
- 6) to use the mail, or a private or commercial interstate carrier for the purpose of executing or attempting to execute a scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1341;
- 7) to use the wire for the purpose of executing or attempting to execute a scheme to defraud, and to obtain money by means of false and fraudulent pretenses, representations, and promises, in violation of Title 18, United States Code, Section 1343.

#### Manner and Means of the Conspiracy

33. As set out below, defendant and others known to the United States generated a variety of fabricated certificates and writings, including export documents, that contained falsified information concerning the source and nature of beef products referenced in the certificates and writings. The false certificates and writings were created in order to give the false impression that the accompanying shipments of beef products complied with the import requirements of the countries to where the beef was being shipped, and accurately reported

information required by the Department of Agriculture.

34. Customer orders were taken by Midamar for the sale and export of Halal beef products to customers in Malaysia and Indonesia.

35. Midamar placed orders by phone or email with PM for the slaughter and production of beef to be used to fill orders received by Midamar, including from customers in Malaysia and Indonesia;

36. PM shipped beef products to Midamar to fulfill orders placed with PM by Midamar.

37. Beef slaughtered and produced by PM, and shipped to Midamar, was marked by PM with PM's USDA establishment number, 683, on adhesive labels adhered to the exterior of the shipping boxes, or preprinted on the exterior of Midamar product boxes; on the individual vacuum-sealed beef product packages contained inside the shipping boxes; and on the accompanying documentation.

38. The USDA establishment number 683 markings were removed by Midamar employees from the individual vacuum-sealed beef product packages, using acetone or nail polish.

39. Midamar employees produced new labels to be placed on the exterior of the boxes of beef received from PM.

40. Midamar employees substituted USDA establishment number 889A (O.P.C.) in place of USDA establishment number 683 (PM) on the boxes received

from PM.

41. USDA establishment number 889A was placed on the beef products intended for export to Malaysia and Indonesia in place of number 683.

42. USDA Export Certificates were generated by Midamar for beef products intended for export to Malaysia and Indonesia. The certificates falsely stated the beef products originated from animals slaughtered at USDA establishment number 889A when, in truth and in fact, the products originated from animals slaughtered at USDA establishment number 683.

43. Letterhead Certificates were also generated to falsely attest that the beef products intended for export to Malaysia and Indonesia had originated from USDA establishment number 889A when, in truth and in fact, the products originated from animals slaughtered at USDA establishment number 683.

44. Midamar employees sent the false Export Certificates and false Letterhead Certificates to USDA inspectors and veterinarians for signature, via the U.S. Mail or commercial courier service.

45. The respective USDA inspectors and veterinarians signed the false Export and Letterhead Certificates in reliance upon the false information contained thereon.

46. The false and fabricated documents referenced above accompanied the respective beef shipments to Malaysia and Indonesia.



47. The beef shipments were transported by a commercial trucking service to a transshipment point where they were exported via air or sea to Malaysia and Indonesia.

48. Malaysia and Indonesia accepted the beef shipments referenced above for import into their countries.

49. Customers in Malaysia and Indonesia paid Midamar for the beef imports referenced above by wire transfer to Midamar's bank account at Cedar Rapids Bank and Trust (CRBT), account number with the last four digits "1568."

50. On a periodic basis Midamar would "sweep" funds from account "1568" to be applied to its loan/line of credit with CRBT, number with the last four digits "2409."

51. As needed, Midamar would regularly draw upon its loan/line of credit with CRBT to fund its operating account, from where payments were made, by check and wire, to satisfy ongoing business expenses including payroll, product, rent, and shipping expenses.

52. Midamar and ISA executives and corporate officers, including defendant, directed, oversaw, and approved of the acts referenced above.

#### Overt Acts

53. In furtherance of the above conspiracy, and to effect the objects thereof, the following overt acts, among others, were committed in the Northern District of

Iowa, and elsewhere:

- a. Customer orders were taken by Midamar, via the internet, email, and telephone, for the sale of purported Halal beef products to customers in Malaysia and Indonesia. Each use of the internet, email, and telephone is alleged to constitute a separate overt act.
- b. Midamar placed orders with PM, via email and telephone, for the slaughter and production of beef to be used to fill orders received from customers in Malaysia and Indonesia by Midamar. Each use of email and the telephone is alleged to constitute a separate overt act.
- c. PM shipped beef products to Midamar, and to processors in Iowa as specified by Midamar, to fulfill orders placed with PM by Midamar. Each such shipment is alleged to constitute a separate overt act.
- d. Payments were wired to Midamar's bank account at CRBT, account number "1568," from outside Iowa and outside the United States, including on about the following dates, for shipments of purported Halal beef sold by Midamar. Each such payment is alleged to constitute a separate overt act:

<u>Date</u>	<u>Amount</u>	<u>From</u>
10-30-2009	\$ 7,982.50	PT Indoguna (Surya Cemerlang)
11-25-2009	15,081.33	Suvinsa
11-24-2009	31,794.92	PT Indoguna (Surya Cemerlang)
12-29-2009	16,105.73	Suvinsa
01-19-2010	7,685.00	Suvinsa
01-19-2010	31,874.80	PT Indoguna (Surya Cemerlang)
01-28-2010	74,459.40	Suvinsa

- e. USDA Export Certificates were generated, including on about the following dates, each of which is alleged as a separate overt act:

	<u>Certificate No.</u>	<u>Issue Date</u>
1.	MPG-317734	June 20, 2007
2.	MPG-317737	June 20, 2007
3.	MPG-317751	August 17, 2007
4.	MPG-762485	January 30, 2008
5.	MPG-762506	April 24, 2008
6.	MPG-762632	June 19, 2008
7.	MPH-057120	July 17, 2008
8.	MPH-057127	July 31, 2008
9.	MPH-057135	August 27, 2008
10.	MPH-057143	September 25, 2008
11.	MPH-057081	October 21, 2008
12.	MPF-410206	April 15, 2009
13.	MPF-410208	April 16, 2009
14.	MPF-410224	June 10, 2009
15.	MPH-059082	September 23, 2009
16.	MPH-059091	October 21, 2009
17.	MPH-059099	October 30, 2009
18.	MPH-059111	November 19, 2009
19.	MPH-059115	December 2, 2009
20.	MPH-059126	December 30, 2009
21.	MPE-042868	January 14, 2010
22.	MPE-042870	January 14, 2010

- f. Letterhead Certificates were generated, for shipments to Malaysia and Indonesia, including on about the following dates, each of which is alleged as a separate overt act:

	<u>Certificate No.</u>	<u>Issue Date</u>
1.	MPG-317734	June 20, 2007
2.	MPG-317737	June 20, 2007
3.	MPG-317751	August 17, 2007
4.	MPG-762485	January 30, 2008
5.	MPG-762506	April 24, 2008



6.	MPG-762632	June 19, 2008
7.	MPH-057120	July 17, 2008
8.	MPH-057127	July 31, 2008
9.	MPH-057135	August 27, 2008
10.	MPH-057143	September 25, 2008
11.	MPH-057081	October 17, 2008
12.	MPF-410206	April 15, 2009
13.	MPF-410208	April 16, 2009
14.	MPF-410224	June 10, 2009
15.	MPH-059082	September 23, 2009
16.	MPH-059091	October 21, 2009
17.	MPH-059099	October 30, 2009
18.	MPH-059111	November 19, 2009
19.	MPH-059115	December 2, 2009
20.	MPH-059126	December 30, 2009
21.	MPE-042868	January 14, 2010
22.	MPE-042870	January 14, 2010

- g. Certificates of Islamic Slaughter were generated and signed by, or on behalf of, the Director of ISA, for shipments to Malaysia and Indonesia, including on about the following dates, each of which is alleged as a separate overt act:

<u>Certificate No.</u>	<u>Issue Date</u>
1. 0620-07-5156	June 22, 2007
2. 0921-07-6327	September 21, 2007
3. 0817-07-6177	August 17, 2007
4. 0130-08-6916	January 30, 2008
5. 0424-08-7117	April 24, 2008
6. 0619-08-7805	June 19, 2008
7. 0716-08-7951	July 16, 2008
8. 0731-08-8027	July 31, 2008
9. Jumada II 1429H	August 2008
10. 0924-08-8285	September 24, 2008
11. 1022-08-8387	October 22, 2008

12.	0416-09-9160	April 16, 2009
13.	0416-09-9161	April 16, 2009
14.	1006-09-9999	June 10, 2009
15.	0925-09-9610	September 25, 2009
16.	1022-09-9700	October 22, 2009
17.	INDO-09-1A	October 30, 2009
18.	INDO-09-2A	November 20, 2009
19.	1203-09-9809	December 3, 2009
20.	1230-09-9893	December 30, 2009
21.	0114-10-9935	January 14, 2010
22.	INDO-10-1A	January 14, 2010

- h. USDA Export Certificates, Certificates of Islamic Slaughter, (corresponding to the respective item numbers noted in subparagraphs (e) and (g) above) and other documents pertaining to particular beef shipments were sent via wire by Midamar to customers in Malaysia and Indonesia, including on about the dates noted below, each of which is alleged as a separate overt act:

<u>No.</u>	<u>Date</u>	<u>Country</u>	<u>Method</u>
17.	11-03-2009	Indonesia	e-mail
18.	11-23-2009	Indonesia	e-mail
19.	12-03-2009	Malaysia	e-mail
20.	12-30-2009	Malaysia	e-mail
21.	01-14-2010	Malaysia	e-mail and fax
22.	01-14-2010	Indonesia	e-mail

- i. USDA Export Certificates, Certificates of Islamic Slaughter, and other documents pertaining to particular beef shipments were deposited to be delivered with a private commercial interstate carrier, for shipments to Malaysia and Indonesia, including on about the dates noted below, each of which is alleged as a separate overt act:

<u>Export No.</u>	<u>Date</u>	<u>Carrier</u>
42870	01-14-2010	Forward Air

42868	01-14-2010	Forward Air
59126	12-31-2009	Forward Air
59115	12-03-2009	Forward Air
59111	11-23-2009	DHL
59099	10-31-2009	Forward Air
59091	10-22 -2009	Forward Air

54. This was in violation of Title 18, United States Code, Section 371.

**COUNTS 2-8**  
**False Statement on Export Certificates**

55. On about the following dates, each such act constituting a separate count, in the Northern District of Iowa, defendant WILLIAM B. AOSSEY, JR., did knowingly make, aid, abet, counsel, induce, and procure the making of a materially false statement on an official certificate provided for in regulations prescribed by the Secretary of Agriculture (Title 9 of the Code of Federal Regulations), to wit: by stating on a Department of Agriculture, Food Safety Inspection Service Form 9060-5, that the meat products reflected thereon were produced at USDA establishment number 889A, when in truth and fact the products had been produced at USDA establishment number 683.

	<b><u>COUNT</u></b>	<b><u>Date</u></b>	<b><u>Certificate Number</u></b>
56.	<b>2</b>	10-21-2009	MPH-059091
57.	<b>3</b>	10-30-2009	MPH-059099
58.	<b>4</b>	11-19-2009	MPH-059111
59.	<b>5</b>	12-02-2009	MPH-059115



60.	6	12-30-2009	MPH-059126
61.	7	01-14-2010	MPE-042868
62.	8	01-14-2010	MPE-042870

63. This was in violation of Title 21, United States Code, Sections 611(b)(5) and Title 18, United States Code, Section 2.

**COUNTS 9 – 15**  
**Wire Fraud**

64. Paragraphs 1-30, 33-52, and 55-62 of this Indictment are incorporated by this reference.

**Scheme to Defraud**

65. Defendant and others schemed to sell and ship purported Halal beef to customers in Indonesia and Malaysia, knowing that the beef did not meet each countries' requirements for beef imports, because it did not originate from a slaughter facility designated and approved by Indonesia or Malaysia, respectively. As part of the scheme, defendant counseled and caused employees of Midamar and ISA to change labels on the beef products, and to fabricate and falsify documents accompanying the beef product shipments for the purpose of making it appear, falsely, that the products originated from a designated approved slaughter facility. The scheme and artifice to defraud was executed with the intent to result in payment of money to Midamar.

66. On about each of the dates referenced below, in the Northern District of Iowa, for the purpose of executing or attempting to execute the above-referenced scheme and artifice to defraud and to obtain money by means of false and fraudulent pretenses, representations, and promises, defendant, WILLIAM B. AOSSEY, JR., and others known to the grand jury, knowingly caused, induced, procured, and aided and abetted the transmission, by means of wire communication in interstate commerce, of monetary payments to Midamar's bank account "1568" at CRBT, as outlined below, each transmission constituting a separate count:

	<u>COUNT</u>	<u>Date</u>	<u>Amount Transmitted</u>	<u>From</u>
67.	9	10-30-2009	\$ 7,982.50	PT Indoguna (Surya Cemerlang)
68.	10	11-25-2009	15,081.33	Suvinsa
69.	11	11-24-2009	31,794.92	PT Indoguna (Surya Cemerlang)
70.	12	12-29-2009	16,105.73	Suvinsa
71.	13	01-19-2010	7,685.00	Suvinsa
72.	14	01-19-2010	31,874.80	PT Indoguna (Surya Cemerlang)
73.	15	01-28-2010	74,459.40	Suvinsa

74. This was all in violation of Title 18, United States Code, Sections 1343 and 2.

**Wire Fraud Forfeiture Allegation**

75. The allegations contained in paragraphs 1-30, 32-53, 55-62, and 65-73 of

this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

76. Upon conviction of the offenses in violation of Title 18, United States Code, Sections 371 and 1343, set forth in Counts 1 and 9 - 15 of this Indictment, the defendant, WILLIAM B. AOSSEY, JR., shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses. The property to be forfeited includes, but is not limited to, a money judgment in the amount of \$ 134,080.01.

77. If any of the property described above, 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 which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).



**COUNTS 16 -18**  
**Money Laundering**

78. The allegations contained in paragraphs 1-30, 32-53, and 55-62 of this Indictment are hereby re-alleged and incorporated by reference.

79. On about each date specified below, in the Northern District of Iowa, defendant, WILLIAM B. AOSSEY, JR., did knowingly cause, aid, abet, induce, procure, attempt, or otherwise engage in one or more monetary transaction(s), within the United States, that is, payments to Tri-Bin, Inc., as described below, with each transaction constituting a separate count, involving criminally derived property having a value in excess of \$10,000, that was derived from specified unlawful activity, that is, wire fraud, and conspiracy to commit wire fraud.

	<u>COUNT</u>	<u>Date</u>	<u>Check Number</u>	<u>Amount</u>	<u>Payee</u>
80.	16	11-30-2009	41529	\$18,750.00	Tri-Bin
81.	17	01-04-2010	41806	18,750.00	Tri-Bin
82.	18	02-01-2010	42024	22,168.52	Tri-Bin

83. This was in violation of Title 18, United States Code, Sections 1957(a) and 2.

**COUNT 19**  
**Money Laundering Conspiracy**

84. Beginning in at least 2007 and continuing through on about 2012, in the Northern District of Iowa and elsewhere, defendant WILLIAM B. AOSSEY, JR., did knowingly and unlawfully combine, conspire, confederate and agree with other

persons whose names are known and unknown to the Grand Jury, to engage in and attempt to engage in one or more monetary transaction(s) within the United States, involving criminally derived property having a value in excess of \$10,000 that was derived from specified unlawful activity, that is, wire fraud, and conspiracy to commit wire fraud, in violation of Title 18, United States Code, Sections 371 and 1343.

85. This in violation of Title 18, United States Code, Section 1956(h).

**Money Laundering Forfeiture Allegation**

86. The allegations contained in Counts 16-18 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Sections 982(a)(1).

87. Pursuant to Title 18, United States Code, Section 982(a)(1), upon conviction of an offense in violation of Title 18, United States Code, Section 1956(h) or Section 1957, the defendant, WILLIAM B. AOSSEY, JR., shall forfeit to the United States of America any property, real or personal, involved in such offense, and any property traceable to such property.

88. If any of the property described above, 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 which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL

KEVIN W. TECHAU  
United States Attorney

By:

RICHARD L. MURPHY  
Assistant United States Attorney

/s/Foreperson

Foreperson

Date

10-23-14