

U.S. Currency was seized from NASA Federal Credit Union Account No. XXXX57-16, in the name of _____; \$16,726.10 in U.S. Currency was seized from NASA Federal Credit Union Account No. XXXX57-00, in the name of _____; and \$38,300 in U.S. Currency was seized from a safe deposit box _____ in the name of _____ pursuant to the execution of a Search and Seizure Warrant, in the State and District of Maryland. In addition, the government seized One 2007 Mercedes Benz S550, VIN _____, from _____, pursuant to the execution of a Search and Seizure Warrant in the State and District of Maryland.

4. Since seizure, the defendant property has been and currently is in the custody of the U.S. Department of Treasury, Internal Revenue Service.

JURISDICTION AND VENUE

5. Plaintiff brings this action *in rem* in its own right to forfeit and condemn the defendant property. This Court has jurisdiction over an action commenced by the United States under 28 U.S.C. § 1345, over an action for forfeiture under 28 U.S.C. § 1355(a), and over this particular action under 18 U.S.C. §§ 981 and 982.

6. This Court has *in rem* jurisdiction over the defendant property under 28 U.S.C. § 1355(b).

7. Venue is proper in this district pursuant to 28 U.S.C. §1355(b)(1), because the acts or omissions giving rise to the forfeiture occurred in this district and pursuant to 28 U.S.C. §1395 because the property is located in this district.

BASIS FOR FORFEITURE

8. The defendant property is subject to forfeiture pursuant to 18 U.S.C. §§ 981 and 982 because it is proceeds involved in money laundering in violation of Title 18 U.S.C. §§ 1956 and 1957.

FACTS

9. The forfeiture is based upon, but not limited to, the evidence outlined in the attached Declaration of Special Agent Tina Fletcher, Internal Revenue Service, which is incorporated herein by reference.

WHEREFORE, the plaintiff prays that all persons who reasonably appear to be potential claimants with interests in the defendant property be cited to appear herein and answer the complaint; that a Warrant of Arrest *in rem* be issued to the Internal Revenue Service commanding the arrest of the defendant property; that the defendant property be forfeited and condemned to the United States of America; that upon Final Decree of Forfeiture, the Internal Revenue Service dispose of the defendant property according to law; and that the plaintiff have such other and further relief as this Court deems proper and just.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

By: 

David I. Salem
Assistant United States Attorney
400 United States Courthouse
6500 Cherrywood Lane
Greenbelt, Maryland 20770
301-344-4433

VERIFICATION

I, David I. Salem, declare under penalty of perjury as provided by 28 U.S.C. §1746, that the foregoing Complaint for Forfeiture is based on reports and information furnished to me by