

18. On or about April 27, 2006, defendant [REDACTED] caused Ameripoint Title of Houston to wire transfer loan proceeds in the amount of \$903,038.67 from Sterling Bank in Houston, Texas, to the account of Imagine Hospitality held at Wells Fargo Bank, N.A., in San Francisco, California.
19. On or about April 28, 2006, defendant [REDACTED] caused Ameripoint Title of Houston to wire transfer loan proceeds in the amount of \$1,045,433.55 from Sterling Bank in Houston, Texas, to the account of Imagine Hospitality held at Wells Fargo Bank, N.A., in San Francisco, California.
20. On or about April 28, 2006, defendant [REDACTED] caused Ameripoint Title of Houston to wire transfer loan proceeds in the amount of \$2,935,012.62 from Sterling Bank in Houston, Texas, to a creditor of Imagine Hospitality, Inc.

All in violation of Title 18, United States Code, Sections 371 and 1343.

COUNT FOUR

On or about September 10, 2003, in the Southern District of Texas, defendant

JENNIFER SAIRA SYDENHAM,

did knowingly engage and attempt to engage in a monetary transaction, affecting interstate and foreign commerce, in criminally derived property of a value greater than \$10,000, that is the wire transfer of funds in the amount of \$60,591.80 to Castle Construction Company, such funds having been derived from a specified unlawful activity, that is wire fraud.

In violation of Title 18, United States Code, Sections 1957 and 2.



NOTICE OF CRIMINAL FORFEITURE
(18 U.S.C. § 982(a)(1))



Pursuant to Title 18, United States Code, Section 982(a)(1), as a result of the commission of a violation of Title 18, United States Code, Sections 1956(h) as charged in Count One of the indictment, notice is given that the defendants,

ABDUL REHMAN DAWOOD,
ABDUL SHAKIR MEMON,
ASLAM ISMAEL KAPADIA,
[REDACTED]

ANEES AKHTAR KHAN,
KHALID ZIA SIDDIQUI,
MOHAMMAD SHAHID SIDDIQUI,
SYED GULAM MOHAMMAD,
SYED GHOUSE MOHIUDDIN,
[REDACTED]

KAMAL AHMAD KHAN,
JENNIFER SAIRA SYDENHAM, and
[REDACTED]

shall forfeit to the United States all property, real and personal, involved in the such offense and all property traceable to such property, including, but not limited to, the following property:
Approximately \$7,080,668.89 (seven million, eighty-thousand, six-hundred sixty-eight dollars and eighty-nine cents) in United States Dollars.

Substitute Assets

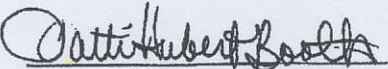
In the event that the property that is subject to forfeiture as a result of any act or omission of the defendants:

- a. cannot be located upon exercise of due diligence;
- b. has been placed beyond the jurisdiction of the Court;
- c. has been transferred or sold to, or deposited with a third party;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of such property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL:
ORIGINAL SIGNATURE ON FILE
FOREPERSON OF THE GRAND JURY

DONALD J. DeGABRIELLE, JR.
UNITED STATES ATTORNEY

By: 
PATTI HUBERT BOOTH
Assistant United States Attorney