

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 2:12-cr-20372

Honorable John Corbett O'Meara

vs.

D-1 MICHAEL RODGERS, et al.,

Defendants.

_____/

GOVERNMENT'S SECOND FORFEITURE BILL OF PARTICULARS

The United States of America, by and through BARBARA L. MCQUADE, United States Attorney and JULIE A. BECK, Assistant United States Attorney, submits this Forfeiture Bill of Particulars pursuant to Rule 7(f) of the Federal Rules of Criminal Procedure to clarify the criminal forfeiture allegations included in the Indictment and all Superseding Indictments, to supplement the statutory provisions that are applicable to this case, and to specify the assets subject to criminal forfeiture that have been identified to date.

This Second Bill of Particulars is likewise submitted for the government to comply with the provisions of 18 U.S.C. § 983(a)(3)(B) and reserves its right to file a civil forfeiture complaint in the future.

This Second Forfeiture Bill of Particulars incorporates by reference, in its entirety, the Fourth Superseding Indictment (Docket #117), specifically the Criminal Forfeiture Allegations which set forth a partial statutory basis for the forfeiture of assets for each substantive count.

Accordingly, pursuant to 21 U.S.C. § 853, the government seeks to forfeit all proceeds, direct or indirect, or property traceable to all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in the Indictment. The asset sought for forfeiture includes, but is not limited to real property located at 5840-50 2ND Blvd, Detroit, Michigan including all buildings, fixtures, improvements and appurtenances, and being more fully described as:

SITUATED IN THE CITY OF DETROIT, WAYNE COUNTY, MICHIGAN, AND MORE PARTICULARLY DESCRIBED AS FOLLOWS:

THE NORTH 10 FEET OF LOT 7, AND LOTS 8, 9, AND 10, MANDELBAUM'S SUBDIVISION OF OUT LOT 117, CASS FARM, AS RECORDED IN LIBER 2, PAGE 8 OF PLATS, WAYNE COUNTY RECORDS.

Tax Parcel No: W212426 and W212427

Titled to: Danielle D. Scott d/b/a at Home Works

Respectfully submitted,

BARBARA L. McQUADE
United States Attorney

s/Julie A. Beck
JULIE A. BECK
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan 48226
(313) 226-9717
julie.beck@usdoj.gov
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Dated April 25, 2016

CERTIFICATION OF SERVICE

I hereby certify that on April 25, 2016, the foregoing was electronically filed with the Clerk of the Court using the ECF system, which will electronically serve all ECF participants.

s/Julie A. Beck
JULIE A. BECK
Assistant United States Attorney
211 W. Fort Street, Suite 2001
Detroit, Michigan
48226 (313) 226-9717
julie.beck@usdoj.gov
[P53291]