

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. ABDIAZIZ SHAFII FARAH,
2. MOHAMED JAMA ISMAIL,
3. MAHAD IBRAHIM
4. ABDIMAJID MOHAMED NUR,
5. SAID SHAFII FARAH,
6. ABDIWAHAB MAALIM AFTIN,
7. MUKHTAR MOHAMED SHARIFF, and
8. HAYAT MOHAMED NUR,

Defendants.

Case No. 22-cr-124 (NEB/TNL)

**UNITED STATES' BILL  
OF PARTICULARS FOR  
FORFEITURE OF PROPERTY**

The United States Attorney's Office for the District of Minnesota, by and through Andrew M. Luger, United States Attorney, and Craig R. Baune, Assistant United States Attorney, files the following Bill of Particulars.

If convicted of any of Counts 1-19 of the Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to Counts 1-19 of the Superseding Indictment.

If convicted of any of Counts 20-42 of the Superseding Indictment, the defendants shall also forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in a transaction or attempted transaction in violation of 18 U.S.C. §§ 1956 and 1957 and any property traceable to such property.

The property subject to forfeiture includes, but is not limited to:

- a. The real property located at 15418 Hampshire Lane, Savage, Minnesota;
- b. The real property located at 13825 Edgewood Avenue South, Savage, Minnesota;
- c. The real property located at 3847 Cane Run Road, Louisville, Kentucky;
- d. The real property located at 438 Stonewood Lane, Burnsville, Minnesota;
- e. The real property located at 5594 Candy Cove Trail SE, Prior Lake, Minnesota;
- f. The real property located at 5604 Candy Cove Trail SE, Prior Lake, Minnesota;
- g. The real property located at 5657 Maple Drive, Lewis Center, Ohio;
- h. The real property located at 6200 South 3rd Street, Louisville, Kentucky;
- i. \$424,695.03 seized from US Bank account No. 104786619932, held in the name of Empire Cuisine and Market LLC;
- j. \$1,842,797.55 seized from US Bank account No. 104785323379, held in the name of ThinkTechAct Foundation;
- k. \$4,000,422.57 seized from JP Morgan Chase Bank account No. 761580833, held in the name of Empire Cuisine and Market LLC;
- l. \$1,286,805.76 seized from JP Morgan Chase Bank account No. 736875953, held in the name of Empire Enterprises LLC;
- m. \$1,249,912.71 seized from 1st United Bank account No. 011707940100 held in the name of Johnson-Reiland Builders and Remodelers Inc.;
- n. \$460,319.56 seized from JP Morgan Chase Bank account No. 736929651, held in the name of Abdiaziz Farah;
- o. \$45,649.27 seized from JP Morgan Chase Bank account No. 736676930, held in the name of Nur Consulting LLC;
- p. \$77,895.32 seized from TruStone Financial Credit Union account No. 892550-1000, held in the name of Bushra Wholesalers LLC;

- q. \$6,442.25 seized from Wells Fargo account No. 5674871586, held in the name of Mohamed Ismail;
- r. \$456,968.36 seized from Spire Credit Union account No. 752231-00, held in the name of MIB Holdings LLC;
- s. \$448,285.14 seized from Spire Credit Union account No. 752231-11, held in the name of MIB Holdings LLC;
- t. \$132,449.90 seized from Stock Yards Bank and Trust account No. 420000534, held in the name of BBI, LLC;
- u. A 2021 Dodge Ram 1500, VIN 1C6SRFJTXMN742870;
- v. A 2021 GMC Sierra PK, VIN 3GTU9DED8MG424943;
- w. A 2021 Hyundai Santa Fe, VIN 5NMS2DAJ9MH347740;
- x. A 2019 Nissan Altima, VIN 1N4BL4BV5KC249675;
- y. A 2021 Porsche Macan S, VIN WP1AB2A50MLB35910;
- z. A 2021 Nissan Murano, VIN: 5N1AZ2CS8MC145760;
- aa. 2022 Tesla Model Y, VIN: 7SAYGDEF6NF340638;
- bb. \$60,350.00 in United States Currency seized from a 2021 GMC Sierra PK, VIN 3GTU9DED8MG424943;
- cc. \$5,954.55 in United States Currency seized from 15418 Hampshire Lane, Savage, Minnesota on January 20, 2022;
- dd. \$865.30 in United States Currency seized from Marschall Road, Shakopee, Minnesota on January 20, 2022;
- ee. \$526.00 in United States currency seized from 2713 5th Avenue South, Minneapolis Minnesota on January 20, 2022;
- ff. Miscellaneous electrical devices seized from 2713 5th Avenue South, Minneapolis Minnesota on January 20, 2022, including:
  - i. iPhone 13 Pro, and

- ii. Apple watch Series 7.
  
- gg. Miscellaneous Jewelry seized from 15418 Hampshire Lane, Savage, Minnesota on January 20, 2022, including;
  - i. Counterfeit Men's Rolex watch Gold and Silver with Opal face watch,
  - ii. Counterfeit Men's Rolex watch Gold and Silver with Black face,
  - iii. Counterfeit Men's Rolex watch silver with silver face and clear stone,
  - iv. Counterfeit Men's Rolex watch silver with blue face,
  - v. Counterfeit Rolex watch silver with blue face,
  - vi. Counterfeit Men's Rolex watch silver and gold with crimson face and clear stones,
  - vii. Counterfeit Men's Heuer Tag Diagono Le Decima CR7 watch with brown leather band,
  - viii. Counterfeit Men's Hubolt "Big Bang" watch with silver band;
  - ix. Gold necklace, gold ring and gold earrings in red and tan case- ceremonial (1B26 JEWELRY: [1] 21kt yellow gold matching jewelry suite to include (1) pair of earrings, (1) adjustable size ring; (1) 7.25" fancy link bracelet, (1) 15.75" necklace with matching pendant and ring clasp; 32.5 grams total weight); and
  - x. Gold ceremonial earring and necklace (1B23 NECKLACE: [1] 21kt yellow gold fancy link, adjustable length, necklace with diamond cut accents, 18" long; [1] Pair 21kt yellow gold matching design dangle earrings, 2" drop; 28.8 grams total weight)
  
- hh. Miscellaneous clothing and accessories seized from 15418 Hampshire Lane, Savage, Minnesota on January 20, 2022;
  - i. Counterfeit Christian Dior Mini Back-pack, gray background with black logo;
  - ii. Y'ves Saint Laurent envelope small bag in mix matelasse grain de poudre embossed leather;
  - iii. Counterfeit Louis Vuitton Backpack, Black;
  - iv. Counterfeit Louis Vuitton, Felecie Pochette Monogram Vernis;
  - v. Canada Goose, Ladies Black short puffer, SZ M;
  - vi. Gucci Sunglasses, Black/gold and tan;
  - vii. Counterfeit Versace T-shirt, Heather Gray, SZ L;
  - viii. Counterfeit Versace T-shirt, Digital print, SZ L;
  - ix. Counterfeit Christian Dior Blaze Orange Broqueted tshirt Dior Symbol, SZ L;
  - x. Counterfeit Givenchy T-Shirt, grey, SZ L;
  - xi. Counterfeit Louis Vuitton Polo, blue, SZ XL;
  - xii. Palm Angels, Black Jeans, SZ 36;

- xiii. Counterfeit Balenciaga T-shirt; and
  - xiv. Counterfeit Gucci Pullover Sweatshirt;
- ii. Miscellaneous electronic devices seized from 15418 Hampshire Lane, Savage, Minnesota on January 20, 2022, including:
    - i. Microsoft Surface Book laptop, S/N: 038601305257;
    - ii. Apple iPhone 13 Pro, Model MLTW3LL/A, S/N: L3C663Q7IJ; and
    - iii. Apple iPhone 13 Pro, model MLTY3LL/A, S/N: P34RJQDW7H;
  - jj. Counterfeit Louis Vuitton Duffle bag seized from a 2021 Dodge Ram 1500, VIN 1C6SRFJTXMN742870 on January 20, 2022.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c) and 18 U.S.C. 982(b)(1).

Dated: 7/28/2023

ANDREW M. LUGER  
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