

2004R00460

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Katharine S. Hayden
v. : Crim No. 04-
MANTHENA RAJA : 18 U.S.C. §§ 982(a)(1),
1956(a)(2) & 2

INFORMATION

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

1. At all times material to this Information:

a. Defendant MANTHENA RAJA, ("defendant RAJA") was a citizen of India who lived in the United Kingdom.

b. Defendant RAJA was not registered with or licensed by the United States Department of State's Directorate of Defense Trade Controls to engage in the business of brokering with respect to the import or transfer of any defense article, as that term is defined in 22 C.F.R. § 121.1.

2. From in or around October, 2002 to in or around March, 2003, in the District of New Jersey and elsewhere, the defendant,

MANTHENA RAJA,

knowingly and with the intent to promote the carrying on of a specified unlawful activity, namely engaging in brokering activities with respect to the import and transfer of foreign defense articles without first registering with or obtaining a license from the Directorate of Defense Trade Controls of the

United States Department of State, contrary to Title 22, United States Code, Section 2778(b)(1) and (c) and Title 22, Code of Federal Regulations, Sections 121.1, 127.1(d), 129.3, 129.6 and 129.7, did transmit and transfer, cause to be transmitted and transferred, and attempt to transmit and transfer, a total of approximately \$86,500 in U.S. currency from places in the United States to and through places outside the United States.

In violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

FORFEITURE ALLEGATION

1. The violation alleged in this Information is realleged and incorporated by reference herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Section 982.

2. As a result of committing the money laundering offense in violation of Title 18, United States Code, Section 1956 alleged in this Information, the defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the offense, and any property traceable thereto, including but not limited to the following:

a) A money judgment equal to \$86,500 in United States currency, representing the amount of proceeds obtained as a result of the offense, in violation of Title 18, United States Code, Section 1956, for which the defendant is liable, pursuant to Federal Rule of Criminal Procedure 32.2(b)(1).

3. If any of the above-described forfeitable property, 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;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p) as incorporated by Title 18, United States Code, Section 982(b), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

CHRISTOPHER J. CHRISTIE
United States Attorney