UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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| UNITED STATES OF AMERICA | ) | |
| | ) | No. 24 CR 424-2 |
| v. | ) | |
| | ) | Judge Jeremy C. Daniel |
| SARGIS URUMIEH | ) | |

**MOTION OF THE UNITED STATES FOR ENTRY OF PRELIMINARY ORDER OF FORFEITURE**

The United States of America, through ANDREW S. BOUTROS, United States Attorney for the Northern District of Illinois, moves for entry of a preliminary order of forfeiture as to specific property pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and Fed. R. Crim. P. 32.2, and in support thereof submits the following:

1. On December 10, 2024, a second superseding indictment was returned charging SARGIS URUMIEH with wire fraud, in violation of Title 18, United States Code, Section 1343 (Counts 1-8).

2. The second superseding indictment sought forfeiture to the United States of any and all right, title and interest defendant SARGIS URUMIEH may have in any property which constitutes and is derived from proceeds traceable to the charged wire fraud offenses, as provided in Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

3. On February 12, 2026, defendant SARGIS URUMIEH entered a voluntary plea of guilty to Count One of the second superseding indictment before the Court. Pursuant to the terms of the plea agreement and as a result of his violation of

Title 18, United States Code, Section 1343 defendant SARGIS URUMIEH agreed that, among other specified property, the following is subject to forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c):

(a) $312,421.88 that is substitute *res* held for 29XX East Chevy Chase Drive in Glendale, California ("the $312,421.88 substitute *res*").

4. Defendant SARGIS URUMIEH has agreed to the entry of a preliminary order of forfeiture relinquishing any right, title, or interest he has in the foregoing property pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) for disposition according to law.

5. Defendant SARGIS URUMIEH further agreed to the entry of a personal money judgment in an amount to be determined by the Court.

6. Because of the defendant's conviction of the above violation, funds in an amount to be determined by the Court and the foregoing $312,421.88 substitute *res* are subject to forfeiture as property which constitutes and is derived from proceeds traceable to the violation of conviction and are therefore subject to forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

7. Pursuant to Fed. R. Crim. P. 32.2(b)(2)(B), unless doing so is impractical, the court must enter the preliminary order of forfeiture sufficiently in advance of sentencing to allow the parties to suggest revisions or modifications before the order becomes final as to the defendant at sentencing.

8. In accordance with this provision, the United States requests that this Court enter a personal money judgment in an amount to be determined by the Court, and further enter a preliminary order of forfeiture pursuant to the provisions of Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) forfeiting all right, title and interest defendant SARGIS URUMIEH has in the funds in an amount to be determined by the Court and the $312,421.88 substitute *res*.

9. Pursuant to the provisions of Title 21, United States Code, Section 853(g), as incorporated by Title 28, United States Code, Section 2461(c), upon entry of this preliminary order of forfeiture, the United States Marshals Service, or any other authorized law enforcement agency, shall seize and take custody of the $312,421.88 substitute *res* for disposition according to law.

10. Further, pursuant to the provisions of Title 21, United States Code, Section 853(n)(1), as incorporated by Title 28, United States Code, Section 2461(c), upon entry of this preliminary order of forfeiture, the United States shall publish notice of this order and of its intent to dispose of the $312,421.88 substitute *res* according to law. The United States may also, to the extent practicable, provide written notice to any person known to have alleged an interest in the property that is the subject of the preliminary order of forfeiture, including but not limited to, Reza Safaeejaved, and Triple S & S LLC, and Triple S & S LLC c/o Sepehr Omrani, Esq.

11. Further, pursuant to the provisions of Title 21, United States Code, Section 853(n)(2), as incorporated by Title 28, United States Code, Section 2461(c), if,

following notice as directed by this Court and Title 21, United States Code, Section 853(n)(1), any person, other than the defendant, asserts a legal interest in the subject U.S. currency that has been ordered forfeited to the United States, within 30 days of the final publication of notice or this receipt of notice under paragraph 10, whichever is earlier, and petitions the Court for a hearing to adjudicate the validity of this alleged interest in the property, the government shall request a hearing. The hearing shall be held before the court alone, without a jury.

12. Following the Court's disposition of all third-party interests, the Court shall, upon the government's motion, if appropriate, enter a final order of forfeiture as to the $312,421.88 substitute *res* which shall vest clear title in the United States of America.

13. Furthermore, Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), provides that if funds to satisfy the personal money judgment entered against defendant SARGIS URUMIEH, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. have been transferred or sold to, or deposited with, a third-party;

c. have been placed beyond the jurisdiction of the Court;

d. have been substantially diminished in value, or

e. have been commingled with other property which cannot be divided without difficulty;

the United States shall request that this Court order the forfeiture of any other property belonging to defendant SARGIS URUMIEH up to the value of the entered judgment amount, in order to satisfy the money judgment entered by the Court.

14. Since funds in the total amount of the outstanding personal money judgment cannot be located to satisfy the forfeiture judgment, pursuant to the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), and Fed. R. Crim. P. 32.2, the United States, upon motion before this Court, has the authority to forfeit substitute assets to satisfy the personal money judgment. Should assets become available to satisfy the forfeiture judgment in the future, the United States shall, at that time, file a motion for substitution of assets before this Court requesting permission to seize such assets and publish notice of the United States' intent to forfeit the property to satisfy the forfeiture money judgment according to law.

15. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code, Section 2461(c), and Fed. R. Crim. P. 32.2, the United States requests that the terms and conditions of this preliminary order of forfeiture entered by this Court be made part of the sentence imposed against defendant SARGIS URUMIEH and included in any judgment and commitment order entered in this case against him.

WHEREFORE, pursuant to the provisions of Title 18, United States Code, Sections 981(a)(1)(C), Title 28, United States Code, Section 2461(c) and Fed. R. Crim. P. 32.2, the United States requests that this Court enter a personal money judgment against defendant SARGIS URUMIEH in an amount to be determined at sentencing, and further enter a preliminary order of forfeiture against defendant SARGIS URUMIEH as to the amount of funds comprising the money judgment and as to the $312,421.88 that is substitute *res* held for 29XX East Chevy Chase Drive in Glendale, California, in accordance with the draft preliminary order of forfeiture which is submitted herewith.

Respectfully submitted,

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