

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	
- v. -	:	
	:	GOVERNMENT’S
APOCALYPSE BELLA,	:	FORFEITURE BILL
a/k/a, “Dias Yumba,”	:	<u>OF PARTICULARS</u>
	:	
MACKENZY TOUSSAINT,	:	21 Cr. 247 (PAE)
a/k/a “Mack,” and	:	
	:	
AMOS MUNDENDI,	:	
a/k/a “Mos,”	:	
a/k/a “El Ashile Mundi”	:	
	:	
Defendants.	:	
	:	
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Pursuant to *United States v. Grammatikos*, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offense described in Counts Three and Four of Indictment 21 Cr. 247 (PAE) APOCALYPSE BELLA, a/k/a, “Dias Yumba,” MACKENZY TOUSSAINT, a/k/a “Mack,” and AMOS MUNDENDI, a/k/a “Mos,” a/k/a “El Ashile Mundi” (the “Defendants”), and as alleged in the forfeiture allegation and/or substitute asset provision therein, includes the following:

- a. \$62,162.04 in United States currency formerly on deposit in J.P. Morgan Chase Bank Account No. 527268095 held in the name of Alvin Emile Maxwell DBA Big Shot and seized on or about June 21, 2021;
- b. \$179,437.72 in United States currency funds formerly on deposit in Fifth Third Bank Account No. 7933474657 held in the name of R and L Arcade Inc. and seized on or about June 21, 2021;

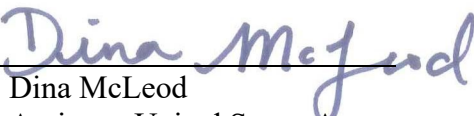
- c. \$209,180.25 in United States currency formerly on deposit in Wells Fargo Bank Account No. 7889836149, held in the name of WPA Green Inc. and seized on or about June 21, 2021; and
- d. \$410,095.62 in United States currency formerly on deposit in Bank of America Account No. 381058902811 held in the name of Oumou Barry LLC and seized on or about June 21, 2021.
- e. All right, title, and interest in 231 Royal Vista Dr. Cedar Hill, TX, with all improvements, appurtenances, and attachments thereon; and
- f. All right, title, and interest in 227 Royal Vista Dr. Cedar Hill, TX, with all improvements, appurtenances, and attachments thereon; and
- g. All right, title, and interest in 461 Ives Dairy Road, Unit 403, Miami, FL, with all improvements, appurtenances, and attachments thereon; and

Dated: New York, New York
November 22, 2021

Respectfully Submitted,

DAMIAN WILLIAMS
United States Attorney

By:


Dina McLeod

Assistant United States Attorney

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