UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA, **Plaintiff,** **v.** **NII A. TEI,** **Defendant.**	**CASE NO. 1:22-CR-00078** **JUDGE DLOTT** **SUPERSEDING INFORMATION** **31 U. S. C. § 5324(a)(3)**

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Structuring Transactions to Evade Reporting Requirements)

Between on or about August 17, 2020 and August 27, 2020, in the Southern District of Ohio and elsewhere, the defendant, **NII A. TEI**, knowingly and for the purpose of evading the reporting requirements imposed upon domestic financial institutions, did structure, attempt to structure, and assist in structuring the following U.S. currency transactions at PNC Bank in Cincinnati, Ohio:

Date	Transaction	Amount	Nature of Transaction
8/17/20	Cash Deposit	$5,000	Paycheck Protection Program proceeds
8/18/20	Cash Deposit	$5,000	Paycheck Protection Program proceeds
8/20/20	Cash Deposit	$3,000	Paycheck Protection Program proceeds
8/24/20	Cash Deposit	$2,600	Paycheck Protection Program proceeds
8/25/20	Cash Deposit	$5,000	Paycheck Protection Program proceeds
8/27/20	Cash Deposit	$5,000	Paycheck Protection Program proceeds

All in violation of 31 U.S.C. § 5324(a)(3).

FORFEITURE ALLEGATION

Upon conviction of the offense set forth in Count 1 of this Superseding Information, the defendant, **NII A. TEI**, shall forfeit to the United States, pursuant to 31 U.S.C. § 5317, any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation.

SUBSTITUTE ASSETS

If any of the property described above, 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 31 U.S.C. § 5317(c) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant, up to the value of the property described above.

KENNETH L. PARKER
UNITED STATES ATTORNEY



EBUNOLUWA A. TAIWO
Assistant United States Attorney