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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. DENNY BHAKTA, Defendant.	Case No. 21cr3352-JLS BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY

Plaintiff, the United States of America, by and through its counsel, Randy S. Grossman, United States Attorney, and Andrew J. Galvin, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

Through the violations of 15 U.S.C. §§ 78j(b) and 78ff , and 17 C.F.R. § 240.10b-5, and 18 U.S.C. § 1957, as alleged in Counts 1 through 7 of the Indictment, which are punishable by imprisonment of more than one year, the United States seeks forfeiture in the Forfeiture Allegations of the following additional properties pursuant to 18 U.S.C. §§ 981(a)(1)(C), 982(a)(1), and 982(b), and 28 U.S.C. § 2461(c):

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One 2017 Porsche 991, 911 Coupe, VIN: WP0AD2A98HS167515; and

One 2016 Audi S8, VIN: WUAJ5AFDXGN900295.

DATED: February 4, 2022.

Respectfully submitted,

RANDY S. GROSSMAN
United States Attorney

s/ Andrew J. Galvin
ANDREW J. GALVIN
Assistant United States Attorney
Attorneys for Plaintiff
United States of America