

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF KENTUCKY
CENTRAL DIVISION
LEXINGTON**

UNITED STATES OF AMERICA

V.

INDICTMENT NO. _____

BARRY BUCHIGNANI

* * * * *

THE GRAND JURY CHARGES:

**COUNT 1
18 U.S.C. § 1349
18 U.S.C. § 1343**

INTRODUCTION

At all times material to this indictment:

1. Warren Reid operated Premiere Mortgage and later Statewide Mortgage, both in Lexington, Kentucky. He acted as a loan broker or loan officer on mortgage loan transactions originating from the companies he operated. Reid was never licensed in Kentucky as either a loan officer or loan broker. When his unlicensed status started to threaten his ability to work in the mortgage industry, Reid did not cease operations. Reid continued carrying out many of the functions of a loan broker — just under another’s license or while holding other job titles.

2. James Davis was the owner and founder of Motor City Enterprises, The Alpha & Omega Group, and Jerrico Builders, all Kentucky limited liability companies. Davis

and others worked for varying periods of time as loan officers or loan officers-in-training under Warren Reid at Statewide Mortgage. Davis also worked in the construction industry, often through one or more of his companies.

3. **BARRY BUCHIGNANI** was a disabled police officer who operated BCI, Inc., a small Lexington-based residential remodeling and construction company. Throughout the conspiracy, he resided at 3164 Chatham Drive, Lexington, Kentucky.

4. Kim Allen Clay was an attorney licensed in Kentucky. Clay also owned and operated Universal Title Service, a company based in Lexington, Kentucky that conducted title searches and performed other functions essential to real estate purchases and loan closings. Universal Title Service had an escrow account into which loan proceeds could be deposited, and out of which disbursements could be made to satisfy lawful debts, such as mortgage liens, at the time of real estate sales transactions.

THE CONSPIRACY AND ITS OBJECT

5. Beginning in or about December 2004, the exact date unknown, and continuing through on or about June 6, 2006, in Fayette County, in the Eastern District of Kentucky, and elsewhere,

BARRY BUCHIGNANI,

the defendant herein, did conspire with others, both known and unknown to the Grand Jury, to devise a scheme and artifice to defraud various residential mortgage lenders by means of false and fraudulent pretenses, representations, and promises, and for the purpose of executing such a scheme, and attempting to do so, caused certain wire

communications and transfers to be transmitted in interstate commerce, in violation of 18 U.S.C. § 1343.

MANNER AND MEANS OF THE CONSPIRACY

6. It was part of the conspiracy that **BARRY BUCHIGNANI** agreed with James Davis and others that **BUCHIGNANI** would purchase a number of expensive homes, but fraudulently finance them for far more than their actual purchase prices. It was further agreed between **BUCHIGNANI**, Davis, and others that false information and assurances would be provided to commercial mortgage lenders in connection with **BUCHIGNANI'S** loan application and loan closing processes. **BUCHIGNANI** and Davis agreed that they would share the excess fraudulent loan proceeds. **BUCHIGNANI** and Davis further agreed that they would combine a portion of the excess proceeds with their own construction expertise in order to improve the properties, often through finishing the basements, in a cost-effective, profitable way. **BUCHIGNANI** and Davis agreed that the properties would be held for a period of time before being resold at a profit and, in the interim, large portions of the fraudulently inflated loan proceeds would be reserved by **BUCHIGNANI** and Davis in order to make payments on the mortgages, thereby keeping the scheme undetected by the victim lenders. **BUCHIGNANI** and Davis also agreed to locate renters for some of the fraudulently obtained houses in order to defray some of the costs of the monthly mortgage payments. Davis also agreed to assist **BUCHIGNANI** in managing the properties and making payments on the loans.

7. It was part of the conspiracy that **BARRY BUCHIGNANI** and others caused documents connected to the mortgage loan process to be completed which contained false and fraudulent information. Victim lenders were provided documents containing false information including, but not limited to, loan applications, real estate contracts, occupancy agreements, leases, checks, tax returns, employment verifications, and profit/loss statements.

a. The fraudulent loan applications contained false information regarding **BUCHIGNANI'S** employment, income, assets, financial liabilities, down payments, marital status, and his intentions to occupy the properties as his primary residence. Many of the loan applications also contained materially false omissions. More specifically, **BUCHIGNANI'S** applications often failed to report a number of the debt-laden houses he already owned, thereby falsely leading lenders to believe he had far less debt than he truly had. In one instance, for example, **BUCHIGNANI** failed to disclose on a loan application that he owned or was purchasing four other houses collectively encumbered by more than \$1,750,000 in mortgage debt.

b. The fraudulent real estate contracts contained false information concerning the sales prices for the properties to be purchased by **BUCHIGNANI**. These falsely inflated figures helped cause the victim lenders to lend amounts of money that far exceeded the true sales prices of the properties.

c. The fraudulent occupancy agreements served to falsely assure victim

lenders that **BUCHIGNANI** intended to occupy many of the residences he purchased when, in fact, he never intended to do so.

d. The fraudulent lease documents falsely stated that **BUCHIGNANI'S** true residence, 3164 Chatham Drive, was being leased to James Davis's relative, Ernest Davis. Once delivered to the victim lenders, these fraudulent leases provided the lenders false assurances about **BUCHIGNANI'S** income and ability to make mortgage payments on multiple properties at the same time.

e. The fraudulent checks included "show checks" written to make it appear that **BUCHIGNANI** had made a substantial down payment on each property, when, in fact, none of the checks were ever intended to be negotiated, none were negotiated, and no down payments were ever made on the loans. Another fraudulent check, one purportedly from Ernest Davis to **BUCHIGNANI** with memo line "3164 Chatham," was presented to a lender in order to falsely substantiate phantom rental income for **BUCHIGNANI** on 3164 Chatham Drive — the house **BUCHIGNANI**, himself, actually lived in.

f. The fraudulent tax returns were submitted to lenders as if the returns had been previously submitted to the Internal Revenue Service. All-the-while, **BUCHIGNANI** and others knew that the returns contained false information and had not been submitted to the Internal Revenue Service. The false tax returns were provided to lenders in order to fraudulently inflate **BUCHIGNANI'S** income and

business prowess.

g. Fraudulent employment verifications and profit/loss documents were provided to lenders in order to falsely inflate **BUCHIGNANI'S** income and business prowess.

8. It was further a part of the conspiracy that **BUCHIGNANI** falsely inflated his bank account balance by depositing into his account money given to him by James Davis. Thereafter, **BUCHIGNANI** caused Bank of the Bluegrass to generate a document verifying account balances, commonly referred to as a verification of deposits, concerning **BUCHIGNANI'S** accounts. Those verifications of deposits, which reflected money given to **BUCHIGNANI** by James Davis in order to further the conspiracy, were presented to lenders. The inflated verifications of deposits gave victim lenders false assurances that **BUCHIGNANI'S** own financial resources were sufficient to cover the down payment amounts associated with his mortgage loans, when, in fact, **BUCHIGNANI** lacked those funds. For example, at a time when **BUCHIGNANI'S** account held approximately \$971.35, he deposited \$30,000 of James Davis's money and procured or caused to be procured a verification of deposits from Bank of the Bluegrass indicating that **BUCHIGNANI'S** account contained \$30,971.35.

9. It was also a part of the conspiracy that **BARRY BUCHIGNANI** and others originated the majority of the fraudulent loans through Statewide Mortgage and First Pacific Mortgage.

10. It was further a part of the conspiracy that **BARRY BUCHIGNANI** and others utilized attorney Kim Allen Clay and Clay's company, Universal Title Service, to falsify loan closing documents and provide proceeds of the fraudulently obtained loans to members of the conspiracy. Clay routinely routed the money received from victim lenders to members of the conspiracy through one of James Davis's companies, often Motor City Enterprises, LLC. Davis, in turn, made payments to **BUCHIGNANI**. Further, Kim Allen Clay and James Davis utilized Universal Title Service's escrow account for improper purposes, such as creating false money trails for bogus down payments, paying for personal expenses, and providing working capital to the mortgage fraud conspiracy. To those ends, proceeds of some of the loans were transferred from Universal Title Service's escrow account into Universal Title Service's operating account, rather than being distributed among Davis, **BUCHIGNANI**, and others.

11. It was also a part of the conspiracy that at least one of Kim Allen Clay's employees falsely notarized signatures on loan documents and assisted in removing money from Clay's escrow account.

12. It was further a part of the conspiracy that the conspirators caused a realtor to prepare or assist in preparing real estate contracts for many of the properties that **BUCHIGNANI** fraudulently purchased. For many of the homes **BUCHIGNANI** purchased, the real estate contracts contained falsely inflated sales prices. These contracts helped **BUCHIGNANI** and others induce lenders to lend far more money on the purchases than would have otherwise been approved.

13. It was further part of the conspiracy that Warren Reid utilized his knowledge and expertise in the mortgage industry to prepare or review several of **BUCHIGNANI'S** loan applications in order to ensure the falsely reported debt and income levels of each fraudulent application met lender requirements.

14. It was also part of the conspiracy that **BARRY BUCHIGNANI** and others fraudulently induced lenders to make interstate wire transfers of mortgage loan proceeds in connection with **BUCHIGNANI'S** home purchases.

OVERT ACTS OF THE CONSPIRACY

15. In furtherance of the conspiracy, and in order to effect the object thereof, the defendant, **BARRY BUCHIGNANI**, and others committed the following overt acts, among others:

a. On or about February 4, 2005, **BARRY BUCHIGNANI** deposited or caused to be deposited into his Bank of the Bluegrass account a cashier's check in the amount of \$30,000 from James Davis.

b. On or about February 7, 2005, **BARRY BUCHIGNANI** obtained or caused to be obtained a verification of deposits from Bank of the Bluegrass indicating that his account balance was \$30,971.35.

c. On or about February 14, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Clay, and others caused a home mortgage loan to be funded via interstate wire transfer by Accredited Home Lenders, Inc., in the amount of \$432,548.44,

purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 916 Belmere Drive, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

d. On or about February 15, 2005, following the closing of **BUCHIGNANI'S** loan for 916 Belmere Drive, James Davis deposited or caused to be deposited into his Motor City Enterprises bank account a check in the amount of \$95,320.97 drawn on Universal Title Service's account.

e. On or about February 16, 2005, **BARRY BUCHIGNANI**, Warren Reid, James Davis, Kim Clay, and others caused a home mortgage loan to be funded via interstate wire transfer by Wilmington Finance, in the amount of \$582,873.53, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 1340 Mumford Way, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

f. On or about February 16, 2005, following the closing of

BUCHIGNANI'S loan for 1340 Mumford Way, James Davis deposited or caused to be deposited into his Motor City Enterprises bank account a check in the amount of \$119,581.31 drawn on Universal Title Service's escrow account.

g. On or about February 17, 2005, **BARRY BUCHIGNANI** deposited or caused to be deposited into his bank account a check in the amount of \$70,951.14 drawn on James Davis's Motor City Enterprises account.

h. On or about March 4, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Clay, and others caused a first home mortgage loan to be funded via interstate wire transfer by Full Spectrum Lending, in the amount of \$350,736.55, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 2453 Rockminster Road, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

i. On or about March 4, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Allen Clay, and others caused a second home mortgage loan to be funded via interstate wire transfer by Full Spectrum Lending, in the amount of \$89,739.00, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 2453 Rockminster Road, Lexington, Kentucky, by submitting documents

containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

j. On or about March 4, 2005, following the closing of **BUCHIGNANI'S** loans for 2453 Rockminster Road, Kim Allen Clay transferred or caused to be transferred \$70,000 from Universal Title Service's escrow account to Universal Title Service's business account. Also on this date, Clay wrote a check to James Davis for \$18,300.24 from Universal Title Service's escrow account. Davis deposited the check into his Motor City Enterprises account on or about March 5, 2005.

k. On or about March 14, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Clay, and others caused a first home mortgage loan to be funded via interstate wire transfer by Argent Mortgage Company, in the amount of \$396,562.66, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 2456 Rockminster Road, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

l. On or about March 14, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Clay, and others caused a second home mortgage loan to be funded via interstate wire transfer by Argent Mortgage Company, in the amount of \$99,140.82, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 2456 Rockminster Road, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

m. On or about March 14, 2005, following the closing of **BUCHIGNANI'S** loans for 2456 Rockminster Road, Kim Allen Clay transferred or caused to be transferred \$70,000 from Universal Title Service's escrow account to Universal Title Service's business account. Also on this date, Clay wrote a check to Motor City Enterprises for \$6,385.18 from Universal Title's escrow account. Davis deposited the check into his personal account on or about March 16, 2005.

n. On or about March 24, 2005, **BARRY BUCHIGNANI** deposited or caused to be deposited into his bank account a cashier's check in the amount of \$20,000 from James Davis.

o. On or about April 7, 2005, Kim Allen Clay withdrew or caused to be

withdrawn \$37,004 from Universal Title Service's escrow account and converted those funds or caused them to be converted into a cashier's check payable to **BARRY BUCHIGNANI**, which **BUCHIGNANI** deposited into his bank account on April 8, 2005.

p. On or about April 18, 2005, James Davis deposited or caused to be deposited into his bank account a cashier's check in the amount of \$27,000 from **BARRY BUCHIGNANI**.

q. On or about April 19, 2005, **BARRY BUCHIGNANI**, James Davis, Kim Clay, and others caused a home mortgage loan to be funded via interstate wire transfer by Argent Mortgage Company, in the amount of \$412,093.96, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 980 Princess Doreen Drive, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

r. On or about April 19, 2005, following the closing of **BUCHIGNANI'S** loans for 980 Princess Doreen Drive, Kim Allen Clay deposited or caused to be deposited into Universal Title Service's escrow account a check in the amount of \$91,185.45 drawn from that very account.

s. On or about April 28, 2005, **BARRY BUCHIGNANI**, Warren Reid, James Davis, Kim Clay, and others caused a first home mortgage loan to be funded via interstate wire transfer by Cimmaron Mortgage Company, in the amount of \$170,285, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 893 Lauderdale Drive, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

t. On or about April 28, 2005, **BARRY BUCHIGNANI**, Warren Reid, James Davis, Kim Clay, and others caused a second home mortgage loan to be funded via interstate wire transfer by Cimmaron Mortgage Company, in the amount of \$31,583.25, purportedly for **BARRY BUCHIGNANI** to purchase residential property located at 893 Lauderdale Drive, Lexington, Kentucky, by submitting documents containing false and fraudulent information including, but not limited to, false and fraudulent financial information about **BUCHIGNANI**, false and fraudulent information about **BUCHIGNANI'S** creditworthiness, and false and fraudulent information about the amount and source of **BUCHIGNANI'S** down payment.

u. On or about April 29, 2005, following the closing of **BUCHIGNANI'S** loans for 893 Lauderdale Drive, Kim Allen Clay withdrew or caused to be withdrawn \$68,815.46 from Universal Title Service's escrow account and converted those funds or caused them to be converted into a \$68,805.46 cashier's check, which Davis deposited into his personal account on May 2, 2005.

v. On or about April 29, 2005, Kim Allen Clay withdrew or caused to be withdrawn \$13,374.53 from Universal Title Service's escrow account, and purchased a cashier's check for \$13,364.53. That check was later re-deposited into Universal Title Service's escrow account for the purpose of making it appear **BUCHIGNANI** made a down payment on his purchase of 893 Lauderdale Drive, Lexington, Kentucky, when, in fact, no down payment was ever made.

All in violation of 18 U.S.C. § 1349.

COUNT 2
18 U.S.C. § 371
18 U.S.C. § 1001

INTRODUCTION

16. The allegations in Paragraphs 1 through 4 are incorporated by reference as if fully set forth herein.

THE CONSPIRACY AND ITS OBJECT

17. Beginning in or about December 2004, the exact date unknown, and continuing through on or about April 28, 2005, in Fayette County, in the Eastern District of Kentucky, and elsewhere,

BARRY BUCHIGNANI,

the defendant herein, did conspire with others, both known and unknown to the Grand Jury, to commit an offense against the United States, that is, to knowingly and willfully make and use certain material false writings and documents in a matter within the jurisdiction of the Department of Housing and Urban Development, an agency of the United States, by presenting or causing to be presented to the Department of Housing and Urban Development HUD-1 settlement statements, knowing the same to be false in violation of 18 U.S.C. § 1001.

MANNER AND MEANS OF THE CONSPIRACY

18. The allegations in Paragraphs 6 through 14 are incorporated by reference as if fully set forth herein.

OVERT ACTS OF THE CONSPIRACY

19. In furtherance of the conspiracy, and in order to effect the object thereof, the defendant, **BARRY BUCHIGNANI**, and others committed the following overt acts, among others:

- a. On or about February 14, 2005, **BARRY BUCHIGNANI**, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is the HUD-1 settlement statement falsely reported the purchase price of 916 Belmere Drive, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI**

and others well knew that the sales price reported on the HUD-1 was inflated and that no down payment was ever made.

b. On or about February 16, 2005, **BARRY BUCHIGNANI**, Warren Reid, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is the HUD-1 settlement statement falsely reported the purchase price of 1340 Mumford Way, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI** and others well knew that the sales price reported on the HUD-1 was inflated and that no down payment was ever made.

c. On or about March 4, 2005, **BARRY BUCHIGNANI**, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is the HUD-1 settlement statement falsely reported the purchase price of 2453 Rockminster Road, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI** and others well knew that the sales price reported on the HUD-1 was inflated and that no down payment was ever made.

d. On or about March 14, 2005, **BARRY BUCHIGNANI**, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is

the HUD-1 settlement statement falsely reported the purchase price of 2456 Rockminster Road, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI** and others well knew that the sales price reported on the HUD-1 was inflated and that no down payment was ever made.

e. On or about April 15, 2005, **BARRY BUCHIGNANI**, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is the HUD-1 settlement statement falsely reported the purchase price of 980 Princess Doreen Drive, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI** and others well knew that the sales price reported on the HUD-1 was inflated and that no down payment was ever made.

f. On or about April 28, 2005, **BARRY BUCHIGNANI**, Warren Reid, Kim Allen Clay, James Davis, and others made and used a Department of Housing and Urban Development HUD-1 settlement statement, knowing the same to be false; that is the HUD-1 settlement statement falsely reported the purchase price of 893 Lauderdale Drive, Lexington, Kentucky and falsely stated that **BUCHIGNANI** made a down payment on the purchase of that property when, in fact, **BUCHIGNANI** and others well knew that the sales price reported on the

HUD-1 was inflated and that no down payment was ever made.

All in violation of 18 U.S.C. § 371.

FORFEITURE ALLEGATION

20. In committing the felony offense alleged in Count 1 of this indictment, punishable by imprisonment for more than one year, the defendant, **BARRY BUCHIGNANI**, shall forfeit to the United States, any and all property which constitutes and is derived from proceeds obtained directly or indirectly as a result of the commission of the aforesaid violations pursuant to 18 U.S.C. §§ 981(a)(1)(C) and 28 U.S.C. § 2641 including, but not limited to, the below described property :

MONEY JUDGMENT

\$576,576.79 (Five Hundred Seventy Six Thousand Five Hundred Seventy Six Dollars), which sum represents the gross proceeds in aggregate obtained by the defendant as the result of the aforesaid violations.

VEHICLES:

- (1) 2005 Ford Freestyle Truck, VIN #1FMDK06105GA47812;
- (2) 2005 Ford 4 x 4 F350 Truck, VIN #1FTWW31P65EB95313.

SUBSTITUTE ASSETS

21. If any of the property listed above, as a result of any act or omission of the defendants,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third party;
- (3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States to seek the forfeiture of any other property in which the above defendant has an interest in, up to the value of the currency described above, including, but not limited to,

REAL PROPERTY:

Real Property and Residence known as 3164 Chatham Drive, Lexington Kentucky.

A TRUE BILL

FOREPERSON

**KERRY B. HARVEY
UNITED STATES ATTORNEY**

PENALTIES

COUNT 1: Not more than 20 years imprisonment, \$1,000,000 fine, and 3 years supervised release.

COUNT 2: Not more than 5 years imprisonment, \$250,000 fine, and 3 years supervised release.

PLUS: Mandatory special assessment of \$100 per count.

PLUS: Restitution, if applicable.

PLUS: Forfeiture of listed assets.