

# Ballard Spahr LLP

919 Third Avenue, 17th Floor  
New York, NY 10022-4915  
TEL 212.223.0200  
FAX 212.223.1942  
www.ballardspahr.com

Charles A. Stillman  
Tel: 212.223.0200 ext. 8015  
Fax: 212.223.1942  
stillmanc@ballardspahr.com

December 1, 2015

*By Electronic Filing*

Honorable Raymond Dearie  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Webb, et al., 15 Cr. 252 (RJD)

Dear Judge Dearie:

I write to report the status of posting the collateral for the bail of my client José Maria Marin. We had hoped to post the \$1 million cash component today, but ran into some difficulty. In any event, a bank check in the amount of \$769,000 will be filed with the Clerk of the Court tomorrow and the balance by Friday December 4<sup>th</sup>.

With respect to the \$2 million dollar surety bond, a letter of credit has been obtained from a Brazilian bank and we are working with the surety to finalize the issuance of the bond. I remain hopeful that will be accomplished by Friday, December 4<sup>th</sup>, or within a short time of that date.

I request that the order directing security for the bail be modified as reflected in this letter.

AUSA Nitze advised me that the Government does not consent to this application.

Your Honor, please be assured that every effort is being made to fulfill the bail obligation.

Respectfully,



Charles A. Stillman

CAS:kj

cc: AUSA Samuel Nitze (by email: [Samuel.Nitze@usdoj.com](mailto:Samuel.Nitze@usdoj.com))