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January 14, 2016

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:

This letter is a status report on the final element of the security for the bail of Jose Maria Marin. Mr. Marin has been released on a \$15 million Appearance Bond, the details of which are spelled out in my letter to the Court of December 11, 2015 (copy enclosed). Mr. Marin has scrupulously adhered to the conditions of his release. Nevertheless, the Surety Bond issue remains unresolved.

I have spoken with AUSA Nitze and explained why we have not been able to obtain the bond. I am working on an alternate proposal to complete the bail package which I will present to AUSA Nitze.

Accordingly, I request that we postpone until February 5 the date for the next report to the Court on the matter of Mr. Marin's bail.

Respectfully yours,



Charles A. Stillman

CAS:kj
Enclosure

cc: AUSA Samuel Nitze (by email: Samuel.Nitze@usdoj.gov)



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December 11, 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 provide a status report of our efforts to complete the requirements of security for the \$15 million dollar Appearance Bond of Jose Maria Marin.

At present we have accomplished the following:

- 1- Mr. Marin is on home confinement, subject to electronic bracelet monitoring and “guarded” on a 24/7 basis by private security, including video surveillance, which he pays for;
- 2- A first mortgage in favor of the U.S. Government on Mr. Marin’s Manhattan apartment valued at \$3.5 million dollars has been filed ;
- 3- Mr. Marin has posted \$1 million dollars cash collateral with the Clerk of the Court.
- 4- A total of 5 responsible persons including his wife of more than 40 years and his son have signed that Bond. Each has been fully advised of their responsibilities in the event Mr. Marin failed to appear in Court.
- 5- His passports have been surrendered and all of the other non-financial requirements have been fulfilled.
- 6- The unresolved item is a \$2 million dollar Corporate Surety Bond.

Mr. Marin, who is 83 years old and a citizen of Brazil, was arrested earlier this year in Switzerland. After litigating the extradition issue in the Swiss court, the bail package reflected above was agreed to between his counsel and the Government. Obviously, there was – and remains

Honorable Raymond Dearie
December 11, 2015
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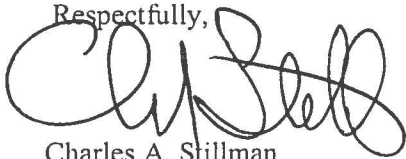
every intention of fulfilling that agreement. Nevertheless, we have encountered difficulties in getting the \$2 million dollar Corporate Surety Bond.

We met this week with Government counsel to propose an alternative for the final piece of security for the bond. It was in the form of a \$2 million dollar Letter of Credit from a Brazilian financial institution. Government counsel rejected the Letter of Credit, because it was from a non-U.S. company, but did agree to review the documents we left with them, although we need to provide translations.

The bottom line is that we are working mightily to resolve this issue so that we can concentrate on dealing with the case itself. I can assure the court that we are working in total good faith to complete this task. No one can doubt that! Indeed, as I write this letter we hope to have additional collateral to bring to the Government and the Court.

Mr. Marin gave up his efforts to resist extradition and came to the U.S. with the complete expectation of posting the agreed upon bail. As reflected above, we have hit a bump, but respectfully urge that we be given further time to complete our task. The prosecutor does not consent to this further application.

Respectfully,

A handwritten signature in black ink, appearing to read 'Charles A. Stillman', written over the word 'Respectfully,'.

Charles A. Stillman

CAS:kj

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