

# BakerHostetler

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February 8, 2023

### VIA ECF

The Honorable Pamela K. Chen  
United States District Judge  
Eastern District of New York  
Brooklyn, NY 11201

Re: *United States v. Full Play Group, S.A.*, Case No. 15-cr-252 (PKC)

Dear Judge Chen:

We write on behalf of Full Play Group, S.A. (“Full Play”) in reference to the letter submitted by counsel for co-defendant, Mr. Hernan Lopez, dated February 7, 2023. Full Play joins in the request to preclude the testimony of witnesses, Sonia Gomez and John Skipper, to the extent those witnesses are expected to testify regarding the 2018, 2022, and 2026 World Cup broadcasting rights. Full Play agrees with counsel for Mr. Lopez that the anticipated testimony is irrelevant and exceeds the scope of the court’s order admitting evidence of alleged conversations regarding the 2018 and 2022 World Cup rights. *See* Fed. R. Evid. 401, 402. Further, any evidence pertaining to the 2018, 2022, and 2026 World Cup rights lacks any relevance whatsoever to the charges pending against Full Play, and thus, the risk of unfair prejudice is heightened. *See* Fed. R. Evid. 403. Last, we agree that this testimony will only serve to confuse the issues, mislead the jury, and prolong the trial. *Id.*

No doubt that the Government’s efforts to continue to introduce evidence pertaining to the FIFA World Cup, despite the evident lack of connection to the current defendants, is a thinly veiled attempt to impermissibly appeal to jurors’ perceptions of the higher profile World Cup. It is undeniable that issues pertaining to the propriety of the award of hosing nation bid and human rights records of Qatar permeate the headlines. The government’s efforts attempt to draw some link—that does not exist—to those issues and this case. There is no other purpose beyond this impermissible appeal.

We appreciate your attention to this matter. If the Court wishes to discuss this request further, we are happy to address any concerns Your Honor might have.

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Regards,

*/s/ Carlos F. Ortiz*

Carlos F. Ortiz  
Partner

cc: All counsel of record (via ECF)