EMN: BDM

F.#2015R00747

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- against -

BILL OF PARTICULARS

Cr. No. 15-252 (RJD)

JEFFREY WEBB,
EDUARDO LI,
JULIO ROCHA,
COSTAS TAKKAS,
JACK WARNER,
EUGENIO FIGUEREDO,
RAFAEL ESQUIVEL,
JOSÉ MARIA MARIN,
NICOLÁS LEOZ,
ALEJANDRO BURZACO,
AARON DAVIDSON,
HUGO JINKIS,
MARIANO JINKIS, and
JOSÉ MARGULIES,
also known as José Lazaro,

Defendants.

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The United States of America, by and through Kelly T. Currie, Acting United States Attorney for the Eastern District of New York, and Brian D. Morris, Assistant United States Attorney, files this Bill of Particulars for forfeiture of property.

The government hereby provides notice that, in addition to the property set forth in paragraphs 343, 345 and 347 of the Indictment, the government also seeks forfeiture of

the following, pursuant to Title 18, United States Code, Section 1963(a), Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c):

- 1. ANY AND ALL FUNDS ON DEPOSIT IN BANK HAPOALIM ACCOUNT NUMBER 7063420 HELD IN THE NAME OF FULL PLAY GROUP S.A., AND ALL PROCEEDS TRACEABLE THERETO; and
- 2. ANY AND ALL FUNDS ON DEPOSIT IN CREDIT SUISSE ACCOUNT NUMBER CH4504835087620042000 HELD IN THE NAME OF FULL PLAY GROUP S.A./DIZMUR S.A., AND ALL PROCEEDS TRACEABLE THERETO.

The government reserves the right to supplement or amend this Bill of Particulars.

Dated: Brooklyn, New York August 1, 2015

> KELLY T. CURRIE Acting United States Attorney Eastern District of New York

By: /s/

Evan M. Norris
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Samuel P. Nitze
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