

BGK:TRP
F. #2018R01809

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

BILL OF PARTICULARS

– against –

Criminal Docket No. 21-65 (RJD)

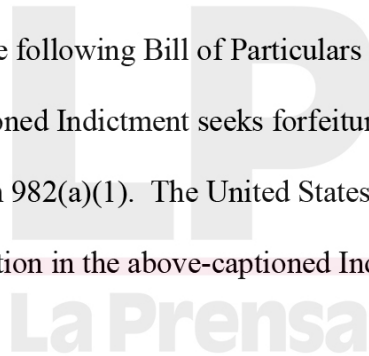
LUIS ENRIQUE MARTINELLI
LINARES and
RICARDO ALBERTO
MARTINELLI LINARES,

Defendants.

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The United States of America, by and through BREON PEACE, United States Attorney for the Eastern District of New York, and Tanisha R. Payne, Assistant United States Attorney, hereby files the following Bill of Particulars for Forfeiture of Property.

The above-captioned Indictment seeks forfeiture of property pursuant to Title 18, United States Code, Section 982(a)(1). The United States hereby gives notice that, in addition to the forfeiture allegation in the above-captioned Indictment, the United States



seeks forfeiture of the following property pursuant to Title 18, United States Code, Section 982(a)(1), as to Counts One through Five of the Indictment:

- (a) Six hundred ninety-seven thousand four hundred fifty-eight dollars and seventy-five cents (\$697,458.75) in United States currency, all accrued interest, and all proceeds traceable thereto; and
- (b) One million dollars and zero cents (\$1,000,000.00) in United States currency, and all proceeds traceable thereto.

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

Dated: Brooklyn, New York
October 29, 2021

Respectfully submitted,

BREON PEACE
United States Attorney

By: /s/ Tanisha Payne
Tanisha R. Payne
Assistant United States Attorney
(718) 254-6358