

***IN THE DISTRICT COURT OF THE UNITED STATES
For the Western District of New York***

April 2014 Grand Jury
(Impaneled April 15, 2014)

THE UNITED STATES OF AMERICA

-vs-

INDICTMENT

PAUL BORRELLI

(Counts 1-13)

JOSEPH RUFF

(Counts 1, 14-23)

MARK RUFF

(Count 1)

Violations:

18 U.S.C. §§ 2, 1955,
1956(a)(1)(B)(i), and 1957(a)

(23 Counts)

(2 Forfeiture Allegations)

**COUNT 1
(Illegal Gambling)**

The Grand Jury Charges:

1. Between in or about January 2012 and continuing thereafter up to and including the date of the return of this Indictment, in the Western District of New York, and elsewhere, the defendants, **PAUL BORRELLI, JOSEPH RUFF, MARK RUFF**, together and with others, did conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit an internet gambling business involving sports betting which was a violation of the laws of the State of New York, to wit, New York Penal Law Sections 225.10, 225.05, and 20, and which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of said illegal gambling business, and which remained in substantially continuous operation for a period in excess of 30 days and had a gross revenue of at least \$2,000 in any single day.

All in violation of Title 18, United States Code, Sections 1955 and 2.

COUNT 2
(Money Laundering)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about January 13, 2012 and continuing thereafter until on or about April 25, 2014, in the Western District of New York, the defendant, **PAUL BORRELLI**, did knowingly conduct financial transactions, that is the deposit of United States currency into Bank of America Account #483007061410 ("Mar Lou Account"), which involved the proceeds of a specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, 1955, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNT 3
(Money Laundering)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about January 3, 2012 and continuing thereafter until on or about April 28, 2014, in the Western District of New York, the defendant, **PAUL BORRELLI**, did knowingly conduct financial transactions, that is the deposit of United States currency into Bank of America Account #483007061407 ("MPR Account") which involved the proceeds of a specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, 1955, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i).

COUNTS 4-13
(Engaging in Monetary Transactions in
Property Derived from Unlawful Activity)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates listed below, in the Western District of New York, the defendant, **PAUL BORRELLI**, did knowingly engage, and attempt to engage, in monetary transactions affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is the withdrawal in the amounts listed below from the bank accounts listed below, and the transfer of funds to the payees listed below, by, through and to financial institutions engaged in and the activities of which affected interstate commerce, such property

having been derived from specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, Section 1955.

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Bank Account</u>	<u>Payee</u>
4	07/05/2012	\$14,919.91	BOA#483007061410 (Mar Lou Corp.)	City Treasurer
5	08/30/2012	\$55,000.00	BOA#483007061407 (MPRCorp)	Panzarella & Coia
6	09/12/2012	\$12,125.74	BOA#483007061407 (MPRCorp)	Kathleen A. Taylor, Receiver
7	11/28/2012	\$30,000.00	BOA#483007061407 (MPRCorp)	Gubiotti Agency
8	07/03/2013	\$14,641.63	BOA #483007061410 (Mar Lou Corp.)	City Treasurer, Rochester, NY
9	07/03/2013	\$13,759.84	BOA#483007061407 (MPRCorp)	City Treasurer, Rochester, NY
10	09/06/2013	\$10,387.33	BOA#483007061407 (MPRCorp)	Kathleen A. Taylor, Receiver
11	04/21/2014	\$19,174.00	BOA#483007061407 (MPRCorp)	United States Treasury
12	04/21/2014	\$19,174.00	BOA#483007061407 (MPRCorp)	United States Treasury
13	04/21/2014	\$19,174.00	BOA#483007061407 (MPRCorp)	United States Treasury

All in violation of Title 18, United States Code, Section 1957.

COUNT 14
(Money Laundering)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. Between on or about January 1, 2012, and continuing thereafter until on or about January 3, 2014, in the Western District of New York, the defendant, **JOSEPH RUFF**, did knowingly conduct financial transactions, that is the deposit of checks issued by a bettor whose identity is known to the grand jury into Citizen's Bank account #7170341511 in the names of M.P. and J.P., which involved the proceeds of a specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, 1955, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 15
(Money Laundering)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. Between on or about January 14, 2012, and continuing thereafter until on or about December 2013, in the Western District of New York, the defendant, **JOSEPH RUFF**, did knowingly conduct financial transactions, that is the deposit of checks issued by a bettor whose identity is known to the grand jury into Citizen's Bank Account #7210008934 in the name of J.P., DBA PM, which involved the proceeds of a specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, 1955, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNT 16
(Money Laundering)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about April 24, 2013, in the Western District of New York, the defendant, **JOSEPH RUFF**, did knowingly conduct a financial transaction, that is the deposit of a check issued by a bettor whose identity is known to the grand jury into ESL Federal Credit Union Account #1366117628 in the names of M.P. and J.P., which involved the proceeds of a specified unlawful activity, that is an illegal gambling business in violation

of Title 18, United States Code, 1955, knowing that the transactions were designed in whole and in part to conceal and disguise the nature, location, source, ownership and control of the proceeds of said specified unlawful activity and knowing that the property involved in the financial transaction represented the proceeds of some form of unlawful activity

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

COUNTS 17-23
(Engaging in Monetary Transactions in
Property Derived from Unlawful Activity)

The Grand Jury Further Charges That:

1. The allegations contained in Count 1 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

2. On or about the dates listed below, in the Western District of New York, the defendant, **JOSEPH RUFF**, did knowingly engage, and attempt to engage, in monetary transactions affecting interstate commerce, in criminally derived property of a value greater than \$10,000, that is the withdrawal in the amounts listed below from the bank accounts listed below, and the transfer of funds to the payees listed below, by, through and to financial institutions engaged in and the activities of which affected interstate commerce, such property having been derived from specified unlawful activity, that is an illegal gambling business in violation of Title 18, United States Code, Section 1955.

<u>Count</u>	<u>Date</u>	<u>Amount</u>	<u>Bank Account</u>	<u>Payee</u>
17	04/12/2012	\$33,032.00	Chase Bank Account #974001106665	United States Treasury
18	05/03/2012	\$10,674.59	Chase Bank Account #974001106665	Panzarella & Coia.
19	11/05/2012	\$24,714.64	Citizens Bank Account #7210008934, held in name of J.P., DBA as PM	Weckesser
20	01/02/2013	\$10,591.46	Chase Bank Account #974001106665	American Express
21	01/14/2013	\$16,000.00	Citizens Bank Account #7210008934, held in name of J.P., DBA as PM	Weckesser Brick
22	03/11/2014	\$20,000.00	Ameritrade Account#864081406	Transfer to BOA Account #483035560970.
23	03/13/2014	\$13,000.00	BOA #483035560970	Cash Withdrawal

All in violation of Title 18, United States Code, Sections 1957 and 2.

FIRST FORFEITURE ALLEGATION
(Illegal Gambling Business Forfeiture)

The Grand Jury Further Alleges That:

Upon conviction of the offense set forth in Count 1 in this Indictment, the defendants, **PAUL BORRELLI, JOSEPH RUFF, and MARK RUFF**, shall forfeit to the United States, all right, title and interest in any property, including money, used in violation of Title 18, United States Code, Section 1955 pursuant to Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461, including but not limited to:

A. MONETARY AMOUNT

The sum of approximately \$76,000,000.00 United States currency, which sum of money is equal to the total amount, which constitutes or is derived from the gross proceeds involved in the illegal gambling business offenses for which the defendants are charged, and for which the defendants are jointly and severally liable. In the event that sum is not available, then a money judgment for the same amount, which amount represents the total amount of proceeds that were obtained, directly or indirectly, as a result of the offense described in Count 1 will be entered against the defendants.

B. SPECIFIC ASSETS

The following specific assets which have been identified as property involved in an illegal gambling business transaction or transactions:

Real Property:

- a. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 360 Edgemere Drive, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 11051 of Deeds at Page 511, on October 13, 2011.
- b. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4768 Lake Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6767 of Deeds at Page 171, on September 3, 1985.
- c. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1440 Scottsville Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 11069 of Deeds at Page 529, on December 7, 2011.

Bank Accounts:

- a. All funds on deposit contained in Bank of America Account #483007061407 in the name of Michael Paul Richards Corporation;
- b. All funds on deposit contained in Bank of America Account #483007061410 in the name of Mar-Lou Realty Holdings Corporation;
- c. All funds on deposit contained in Canandaigua National Bank & Trust Accounts #1104521104 in the name of Joseph Ruff;
- d. All funds on deposit contained in Bank Of America Account #483035560970 in the name of Joseph L. Ruff;
- e. All funds on deposit contained in Chase Bank Account #974001106665 in the name of Joseph L. Ruff; and
- f. All funds on deposit contained in Bank of America Account #483037292699 in the name of 4768 Lake Ave LLC – The Marina.

Vehicles:

- a. One 2013 Toyota 4runner bearing VIN #JTEBU5JR8D5148196.

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants;

- 1. cannot be located upon the exercise of due diligence;
- 2. has been transferred or sold to, or deposited with, a third person;
- 3. has been placed beyond the jurisdiction of the Court;
- 4. has been substantially diminished in value; or
- 5. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), including but not limited to:

Real Property

- a. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 348 Ridge Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6369 of Deeds at Page 17, on August 18, 1983.
- b. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 3641 Dewey Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5103 of Deeds at Page 274, on September 27, 1976.
- c. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1350 Latta Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5539 of Deeds at Page 339, on November 22, 1978.
- d. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1234-1238 East Ridge Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 09109 of Deeds at Page 0475, on January 7, 1999.
- e. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1358 Latta Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5715 of Deeds at Page 195, on November 13, 1979.

- f. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4850 West Henrietta Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6110 of Deeds at Page 238, on February 26, 1982.
- g. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 26 Long Pond Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5539 of Deeds at Page 341, on November 22, 1978.
- h. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1485 Mount Read Boulevard, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 8337 of Deeds at Page 672, on May 14, 1993.
- i. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4776 Lake Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 08384 of Deeds at Page 0424, on September 10, 1993.
- j. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 31B Veldor Park, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 8993 of Deeds at Page 692, on April 13, 1998.
- k. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1099 Britton Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 10154 of Deeds at Page 0084, on July 14, 2005.

Bank Accounts:

- a. All funds contained in TIAA-CREF Personal Annuity Select account in the name of Paul P. Borrelli, Contract Number 0-852148-3.
- b. All funds contained in TIAA-CREF Personal Annuity Select account in the name of Paul P. Borrelli, Contract Number 0-838266-5.

- c. All funds contained in TIAA-CREF AFTER TAX RETIREMENT ANNUITY account in the name of Paul P. Borrelli, identified as TIAA D614700-5, CREF V614700-2.
- d. All funds contained in TIAA-CREF SUNY ORP PRE-1990/CLASSIFIED TDA PLAN in the name of Paul P. Borrelli, identified as TIAA A505749-0, CREF P505749-7 and TIAA IG14587-4.

Mortgages:

- a. The \$445,000.00 note held by Mar-Lou Holdings Corp. for the premises and real property located at 1158 Fairport Road, Perinton, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 22308 of Mortgages at Page 494, on April 20, 2009.
- b. The \$100,000.00 note held by Mar-Lou Holdings Corp. for the premises and real property located at 1158 Fairport Road, Perinton, New York as more particularly described in a certain mortgage recorded in the Monroe County Clerk's Office at Liber 22308 of Mortgages at Page 499, on April 20, 2009.
- c. The \$235,000.00 note held by Michael Paul Richards Corporation for the premises and real property located at 675 East Main Street, Rochester, New York as more particularly described in a certain mortgage recorded in the Monroe County Clerk's Office at Liber 23225 of Mortgages at Page 643, on October 4, 2010.

All pursuant to the provisions of Title 18, United States Code, Section 1955(d), Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461.

SECOND FORFEITURE ALLEGATION
(Money Laundering Forfeiture)

The Grand Jury Further Alleges That:

Upon conviction of one or more of the offenses set forth in Counts 2 through 23 of this Indictment, the defendants, **PAUL BORRELLI and JOSEPH RUFF**, shall forfeit to the

United States, pursuant to Title 18, United States Code, Section 982(a)(1), the following property:

A. PROPERTY

All right, title and interest in any and all property involved in violation of Title 18, United States Code, Sections 1956 or 1957, or conspiracy to commit such offenses, for which the defendant is convicted, and all property traceable to such property, including the following: 1) all money or other property or traceable to such property, that was the subject of each transaction, transmission or transfer in violation of Sections 1956 or 1957; 2) all commissions, fees and other property constituting proceeds obtained as a result of those violations; and 3) all property or traceable to such property, used in any manner or part to commit or to facilitate the commission of those violations.

B. MONETARY AMOUNT

1. The sum of approximately \$1,038,369.00 United States currency, which sum of money is equal to the total amount of money involved in the money laundering offenses for which the defendants are charged, and for which the defendants are jointly and severally liable.

C. SPECIFIC ASSETS

The following specific assets which have been identified as property involved in a money laundering transaction or transactions:

Real Property:

- a. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 360 Edgemere Drive, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 11051 of Deeds at Page 511, on October 13, 2011.
- b. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4768 Lake Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6767 of Deeds at Page 171, on September 3, 1985.
- c. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1440 Scottsville Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 11069 of Deeds at Page 529, on December 7, 2011.

Bank Accounts:

- a. All funds on deposit in Bank of America Account #483007061407 in the name of Michael Paul Richards Corporation;
- b. All funds on deposit in Bank of America Account #483007061410 in the name of Mar-Lou Realty Holdings Corporation;
- c. All funds on deposit in Canandaigua National Bank & Trust Accounts #1104521104 in the name of Joseph L. Ruff;
- d. All funds on deposit in Bank Of America Account #483035560970 in the name of Joseph L. Ruff; and
- e. All funds on deposit in Chase Bank Account #974001106665 in the name of Joseph Ruff.
- f. All funds on deposit contained in Bank of America Account #483037292699 in the name of 4768 Lake Ave LLC – The Marina

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), including but not limited to:

- a. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 348 Ridge Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6369 of Deeds at Page 17, on August 18, 1983.
- b. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 3641 Dewey Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5103 of Deeds at Page 274, on September 27, 1976.
- c. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1350 Latta Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5539 of Deeds at Page 339, on November 22, 1978.
- d. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1234-1238 East Ridge Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 09109 of Deeds at Page 0475, on January 7, 1999.
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Monroe County Clerk's Office at Liber 5715 of Deeds at Page 195, on November 13, 1979.

- f. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4850 West Henrietta Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 6110 of Deeds at Page 238, on February 26, 1982.
- g. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 26 Long Pond Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 5539 of Deeds at Page 341, on November 22, 1978.
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- i. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 4776 Lake Avenue, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 08384 of Deeds at Page 0424, on September 10, 1993.
- j. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 31B Veldor Park, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 8993 of Deeds at Page 692, on April 13, 1998.
- k. The premises and real property with its buildings, improvements, fixtures, attachments and easements, located at 1099 Britton Road, Rochester, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 10154 of Deeds at Page 0084, on July 14, 2005.

Bank Accounts:

- a. All funds contained in TIAA-CREF Personal Annuity Select account in the name of Paul P. Borrelli, Contract Number 0-852148-3.

- b. All funds contained in TIAA-CREF Personal Annuity Select account in the name of Paul P. Borrelli, Contract Number 0-838266-5.
- c. All funds contained in TIAA-CREF AFTER TAX RETIREMENT ANNUITY account in the name of Paul P. Borrelli, identified as TIAA D614700-5, CREF V614700-2.
- d. All funds contained in TIAA-CREF SUNY ORP PRE-1990/CLASSIFIED TDA PLAN in the name of Paul P. Borrelli, identified as TIAA A505749-0, CREF P505749-7 and TIAA IG14587-4.

Mortgages:

- a. The \$445,000.00 note held by Mar-Lou Holdings Corp. for the premises and real property located at 1158 Fairport Road, Perinton, New York as more particularly described in a certain deed recorded in the Monroe County Clerk's Office at Liber 22308 of Mortgages at Page 494, on April 20, 2009.
- b. The \$100,000.00 note held by Mar-Lou Holdings Corp. for the premises and real property located at 1158 Fairport Road, Perinton, New York as more particularly described in a certain mortgage recorded in the Monroe County Clerk's Office at Liber 22308 of Mortgages at Page 499, on April 20, 2009.
- c. The \$235,000.00 note held by Michael Paul Richards Corporation for the premises and real property located at 675 East Main Street, Rochester, New York as more particularly described in a certain mortgage recorded in the Monroe County Clerk's Office at Liber 23225 of Mortgages at Page 643, on October 4, 2010.

All pursuant to Title 18, United States Code, Section 982(a)(1), and Title 21, United States Code, Section 853(p).

DATED: Rochester, New York, June 24, 2014.

WILLIAM J. HOCHUL, JR.
United States Attorney

By: s/ROBERT A. MARANGOLA
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A TRUE BILL:

S/FOREPERSON
FOREPERSON