

FILED

JUN 15 2021

**United States District Court
Northern District of Ohio – Eastern Division**

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

1:21 CV 1196

Case No. _____

JUDGE BARKER

COMPLAINT

(Quiet Title, 28 U.S. Code § 2409)

Anthony L. Viola,
2820 Mayfield Road
Apartment # 205
Cleveland Heights, Ohio 44118,
(330) 998-3290
Plaintiff

-vs.-

Cuyahoga County Land Bank
812 Huron Rd E
Suite 800
Cleveland, OH 44115

Federal Bureau of Investigation
1501 Lakeside Avenue, East
Cleveland, Ohio 44114
c/o Special Agent Eric Smith
216-522-1400

U.S. Department of Justice
801 West Superior Avenue
4th Floor
Cleveland, Ohio 44113
c/o Bridget Brennan
Acting U.S. Attorney

Master Commissioner Donald J. DeSanto
3731 Boardman-Canfield Road
Canfield, Ohio 44406
(330) 702-8800
DDesanto@Desantolaw.com

US Bank Home Mortgage
4801 Frederica Street
Owensboro, KY 42301

Federal National Mortgage Association
P.O. Box 650043
Dallas, Texas 75265-0043

Mark S. Bennett
1991 Crocker Road
Suite 600
Westlake, OH 44145

Defendants

INTRODUCTION

1. Plaintiff brings this action pursuant to the Quiet Title Act (“QTA”), 28 U.S.C. §2409a, which authorizes a federal district court to adjudicate disputes over the title to real property in which the United States claims an interest.
2. Plaintiff was prosecuted in both state and federal court on mortgage fraud allegations by a multi-jurisdictional and federally funded Mortgage Fraud Task Force.
3. Following the issuance of indictments, the United States placed a lis pendens on the subject property located at 3048 Meadowbrook Blvd., Cleveland Heights, Ohio, Parcel No. 686-09-094
4. Plaintiff proceeded to trial in both state and federal court. Following a federal conviction, a subsequent acquittal on the same charges was obtained in state court, in a case prosecuted by the same prosecution team, utilizing evidence not provided prior to the first trial.
5. Following the federal conviction, in 2012, a lien was placed on the Meadowbrook property in support of a judgment in a criminal case in the amount of \$1,256,528.49.
6. As part of the criminal case, a formal restitution order was issued, obligating Plaintiff to pay restitution, which he has done for a decade, on time and in accordance with various contractual agreements. This restitution order states that the Plaintiff is jointly and severally liable for restitution with co-defendants.

7. Several co-defendants and other parties to criminal proceedings agreed to forfeit properties to the Cuyahoga County Land Bank as part of settlements of the criminal matters. However, the Plaintiff refused to plead guilty or voluntarily forfeit any property to the Land Bank and no forfeiture order was ever issued by a court of competent jurisdiction concerning any property owned by the Plaintiff, including the Meadowbrook property.
8. In April, 2021, newly obtained documents resulting from litigation over records in the Plaintiff's criminal cases confirm the Department of Justice and the multi-jurisdictional task force collected funds from the Plaintiff and others far in excess of the lien amount, but failed to disclose this fact to the Plaintiff. Instead, Defendants utilized the lien to: (1) Refuse to grant Plaintiff permission to sell the property; (2) Remove a state foreclosure to federal court, where a Master Commissioner transferred title; (3) Transfer the property from the Plaintiff to the Cuyahoga County Land Bank without compensating Plaintiff or crediting funds to any restitution balance; and (4) Effectively seizing the 3048 Meadowbrook property without compensation, in violation of the United States Constitution.
9. This action seeks to "quiet title" by extinguishing all claims to the property by defendants and seeks an order returning the deed to the subject property to the Plaintiff.

PARTIES

10. Plaintiff Anthony Viola utilized an FHA loan in the approximate amount of \$128,000 to purchase the property located at 3048 Meadowbrook in 1993, which he and Katrina Rose restored, and where he resided until his imprisonment.
11. Defendant US Bank held a first mortgage on the property and, in 2017, initiated a foreclosure action, stating it was owed approximately \$60,000.
12. Defendant Department of Justice placed a lien on the 3048 Meadowbrook property in 2012.

13. Defendant Federal Bureau of Investigation claimed that the Meadowbrook property was subject to “forfeiture.”
14. Defendant Federal National Mortgage Company (“Fannie Mae”) took title to the property and deeded it to the Cuyahoga County Land Bank.
15. Master Commissioner Donald J. DeSanto executed a deed to the property from US Bank to Fannie Mae, who deeded the property to the Cuyahoga County Land Bank, without any usual and customary sales process to recover the first mortgage proceeds the bank claimed in the foreclosure litigation.
16. Defendant Cuyahoga County Land Bank was the repository for all properties forfeited in mortgage fraud cases prosecuted by the Task Force. Several criminal defendants were ordered to forfeit properties to the Land Bank, or agreed to forfeit properties to the Land Bank as part of a resolution of criminal matters.
17. Defendant Mark Bennett negotiated several forfeiture agreements with co-defendants, and others, where properties were forfeited to the Cuyahoga County Land Bank. Bennett is an indispensable party in this matter, who has personal knowledge of critical events. As a result, this matter cannot be resolved without his involvement.

VENUE AND JURISDICTION

18. Venue is proper in this Court under 28 U.S.C. §1391(e) and 28 U.S.C. §81A because the property at issue in this lawsuit is located within the Northern District of Ohio, and a substantial part of the controversy at issue in this litigation took place in this judicial district.

STANDING

19. The Plaintiff has suffered “injury in fact” which was caused – both actually and proximately - by the Defendants in an amount that exceeds \$75,000.00. Moreover, various appraisals commissioned by the defendants all confirm the subject property has a value in excess of

\$75,000. The injury set forth herein is concrete and particularized in this complaint for which this Court has authority to order redress in favor of the Plaintiff.

STATUTE OF LIMITATIONS

20. This action has “commenced within twelve years of the date” that The United States asserted its right to seize the property and is within the statute of limitations set forth in 28 U.S. Code § 2409(g).

IMMUNITY

21. The United States may not assert sovereign immunity in this matter because The Quiet Title Act (“QTA”), 28 U.S.C. §2409a authorizes a federal district court to adjudicate disputes over the title to real property in which the United States claims an interest.

STATEMENT OF FACTS

22. Following a federal conviction and restitution order, the Department of Justice placed a lien on the 3048 Meadowbrook property in 2012, **Exhibit A**. Plaintiff was imprisoned for nearly a decade and has made restitution payments the entire time, never missing any payments.

23. During his imprisonment, Plaintiff attempted to sell the property, but the Department of Justice refused to facilitate a sale, claiming it was the beneficiary of an unpaid lien in the amount of \$1.25 million.

24. Between the Plaintiff’s imprisonment on January 5, 2012, and the commencement of the foreclosure, Defendant Mark Bennett negotiated a series of agreements with co-defendants, including Uri Gofman, to forfeit properties to the Cuyahoga County Land Bank.

25. Plaintiff’s restitution order makes clear he is jointly and severally liable for **Exhibit B**.

26. Defendant Bennett was involved in the resolution of state court proceedings where Mr. Gofman – who is jointly and severally liable for restitution with the undersigned -- agreed to

pay \$1 million in restitution to the same victims and concerning the same properties, **Exhibit C**.

27. Between 2012 and 2016, several co-defendants of the undersigned were subject to restitution orders and made payments, including Noah Bloch and James Leoni.
28. In addition, related prosecutions by the Task Force included the same properties and same victims and included restitution orders that led to collection of funds from nearly a dozen individuals. According to indictments, these individuals conspired with the Plaintiff to dupe banks into making 'no money down' mortgage loans and the government claims that the named defendants are co-conspirators with the Plaintiff, State of Ohio v. Karen Harris, et. al., 10-cr-551555, Cuyahoga County Common Pleas Court.
29. Seventeen (17) of the mortgage loans and properties at issue in the Viola federal restitution order are also listed in the Harris matter. Just to cite two examples, kindly note that 3233 Dellwood is Count 33 in Viola and Count 83 in Harris, while 9809 Orleans is Count 12 in Viola, and count 85 in Harris.
30. The titled owner of 15 of the properties in the Viola criminal matter was Deutsche Bank National Trust Company as Trustee of the Long Beach Mortgage Loan Trust 2005 WL. Just to cite two examples, this entity owned the mortgages on the properties located at 1670 East 71st Street, Cleveland (Count 5 in the Viola criminal case), 3476 East 76th Street, Cleveland (Count 6), and more than a dozen other properties.
31. Deutsche Bank National Trust Company as Trustee of the Long Beach Mortgage Loan Trust 2005 WL was involved in civil litigation with the mortgage originator and received a substantial recovery from civil litigation in Deutsche Bank National Trust Company v. Federal Deposit Insurance Corp., et al., 1:09-cv-01656-RMC, District of Columbia District Court.
32. The Defendant Department of Justice was a party to a \$7.2 civil fraud settlement with Deutsche Bank that involved several of the same properties at issue in the Viola criminal case, including

Counts 18-21 in the federal indictment, 686 East 130th, 9905 Elizabeth, 9013 Laisy Avenue and 3439 East 71st, all located in Cleveland, Ohio, see DOJ website for details at <https://www.justice.gov/opa/pr/deutsche-bank-agrees-pay-72-billion-misleading-investors-its-sale-residential-mortgage-backed>

33. At no time have any of the Defendants properly tracked civil fraud, criminal restitution or other recoveries concerning the same victims, mortgage loans and transactions, nor have any of the Defendants put in place a proper accounting mechanism to properly credit recoveries to victims to ensure the victims receive the amount of the loss – but no additional recoveries, which would constitute an improper windfall under federal and state law.
34. In addition to failing to account for the collection of restitution, or to credit the lien balance, some funds collected pursuant to restitution orders has not been remitted to any victims.
35. A ledger of restitution disbursements and collections confirms that funds collected from co-defendants by the multi-jurisdictional Task Force were not forwarded to the victims listed on restitution orders, but utilized to purchase airline tickets, pay for hotel rooms and acquire computers, **Exhibit D**.
36. Taken together, the \$1 million Gofman restitution payment, and other recoveries from Plaintiff and others jointly and severally liable for restitution, far exceeds the amount of the lien placed on the 3048 Meadowbrook property.
37. In 2016, a foreclosure action was filed by the first mortgage holder, US Bank, claiming the bank was owed approximately \$61,400.
38. Following a judgment in its favor, US Bank did not proceed to sell the property through a foreclosure process at a foreclosure or through an on line action, but assigned its winning bid at a foreclosure auction held by Defendant Master Commissioner Donald J. DeSanto to Defendant Fannie Mae, who subsequently deeded the property to defendant Cuyahoga County Land Bank – all for no financial consideration.

39. During the foreclosure, multiple estimates of value confirmed the home (which was purchased for approximately \$135,000 in 1993) has an approximate value of nearly \$200,000.

40. At no time has the Plaintiff received any:

- Accounting for sales proceeds, less first mortgage balance;
- Proceeds from the foreclosure sale; or
- A credit to the restitution obligation (if, in fact, any obligation remains) from proceeds in excess of the first mortgage.

41. Unlike other defendants who agreed to forfeit properties to the Land Bank, the undersigned has never agreed to do so, nor has a court issued any such forfeiture order (Please see restitution order, pages 2-3, attached hereto.)

FIRST CAUSE OF ACTION – Failure to Follow Ohio Revised Code § 2329.44

42. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 41 above, inclusive.

43. Pursuant to Ohio Revised Code. § 2329.44, after a foreclosure sale, Ohio law specifies the order in which the funds raised are used. The funds are first be used to pay for the costs of the foreclosure action. Then, the funds will be applied against the balance owed on the mortgage or tax lien. Any excess amount will then be applied to pay off junior liens or remaining unpaid taxes, if any.

44. According to Ohio Law, if there is still a surplus left over after all the above are paid, then that amount belongs to the owner whose home was foreclosed, or should have been credited against the restitution obligation, O.R.C. § 2329.44.

45. The failure of the Defendants to follow the statutory requirements concerning the disbursement of proceeds has damaged the Plaintiff in an amount to be determined at trial.

SECOND CAUSE OF ACTION – Conversion

46. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 45 above, inclusive.

47. Despite collecting funds from the Plaintiff and others that were identified as “restitution” in court orders, Defendant Department of Justice, and others, failed to properly account for these funds and apply credits to the lien it filed against the 3048 Meadowbrook property.

48. Despite a lawful obligation to apply restitution payments towards restitution, and provide timely and accurate lien payoff information, Defendants converted restitution funds to other uses.

49. The ledger of restitution collections from co-defendant Uri Gofman and James Leoni, among others, confirms that restitution has not been properly forwarded to victims, nor have payments been credited against the lien against the 3048 Meadowbrook property.

50. The Defendants’ failure to credit payments against the lien (and to file a satisfaction of lien when funds in excess of the lien amount were collected) allowed the Defendant Department of Justice to remove a state foreclosure action to federal court and deprive Plaintiff of his property.

THIRD CAUSE OF ACTION – Seizure of Property Without a Forfeiture Order

51. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 50 above, inclusive.

52. According to recently obtained FBI documents, the government seized the property located at 3048 Meadowbrook, **Exhibit E**.

53. The transfer of the 3048 Meadowbrook property through a series of deed assignments, without an open market sale and without crediting excess proceeds to the restitution balance or remitting those dollars to the Plaintiff, constitutes an unlawful seizure of property, in violation of the United States Constitution.
54. The value of the property far exceeded the first mortgage balance, and sales proceeds in excess of that amount should have accrued to the Plaintiff, either through direct payment, credit against restitution owed, or a combination of both.
55. The Plaintiff was never the subject of a forfeiture order, and the property at 3048 Meadowbrook was never included in any forfeiture order, yet the Land Bank obtained a property worth nearly \$200,000 without payment and without remitting any funds to the Plaintiff or – on behalf of the Plaintiff -- to the Clerk of Court to be credited against the restitution balance, or the judgment lien.
56. The transactions and deed assignments outlined above are a seizure of the property from the Plaintiff to the Land Bank without compensation.

FOURTH CAUSE OF ACTION: Unjust enrichment

57. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 56 above, inclusive.
58. While other individuals agreed to forfeit – or were ordered to forfeit – properties to the Land Bank, the Plaintiff never agreed to any such forfeiture, nor did a court order such forfeiture.
59. The transfer of the property at 3048 Meadowbrook to the Defendant Cuyahoga County Land Bank without any payment confirms that the defendant received a benefit – a property worth \$200,000 -- at the Plaintiff's expense, constituting unjust enrichment.

FIFTH CAUSE OF ACTION – Fraudulent Conveyance

60. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 59 above, inclusive.
61. The lien placed on the 3048 Meadowbrook was long since satisfied before the commencement of the foreclosure proceeding in state court.
62. Despite collecting funds in excess of the lien amount, defendant Department of Justice fraudulently utilized the existence of a lien it claimed was not satisfied as the basis for its effective seizure of the Meadowbrook property.
63. Failure to Sell the Property in a market-based setting but, instead, relying on a series of transfers that resulted in the property being owned by the Defendant Cuyahoga County Land Bank constitute a fraudulent conveyance of real property.

SIXTH CAUSE OF ACTION: Violation of 18 U.S. Code § 3613

64. Plaintiff Anthony Viola repeats and re-alleges the allegations contained in paragraphs 1 through 63 above, inclusive.
65. 18 U.S. Code § 3613 states, in relevant part, “an order of restitution made pursuant to sections 2248, 2259, 2264, 2327, 3663, 3663A, or 3664 of this title, is a lien in favor of the United States on all property and rights to property of the person fined as if the liability of the person fined were a liability for a tax assessed under the Internal Revenue Code of 1986. The lien arises on the entry of judgment and continues for 20 years or until the liability is satisfied, remitted, [or] set aside.”
66. This statute creates an affirmative obligation on the part of the Defendant Department of Justice to provide an accurate lien payoff amount concerning its lien on the 3048 Meadowbrook property.

67. The same victims, mortgage loans and transactions were involved in multiple civil and criminal fraud proceedings, while restitution orders clearly state that co-defendants were jointly and severally liable for restitution, requiring funds received from these individuals to be credited against the lien payoff on the Meadowbrook property.
68. Recoveries to victims between the filing of the lien in 2012 and the conclusion of the foreclosure action in 2019 far exceeded of the amount of the lien.
69. Despite recoveries in excess of the lien amount, defendant Department of Justice failed to remove the lien, or otherwise facilitate an orderly transfer of the 3048 Meadowbrook property. Instead, the United States used the lien as a vehicle to transfer the foreclosure to federal court, resulting in its sale by the Master Commissioner, without any proceeds to the Plaintiff.
70. Defendant Department of Justice's failure to follow its lawful obligations under this statute to properly track payments and credit the lien amount damaged the Plaintiff by depriving him of his property, or proceeds from the sale of the property, or a credit to any remaining restitution balance, if any.

PRAYER FOR RELIEF

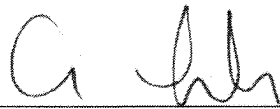
WHEREFORE, the Plaintiff prays for the following relief:

- (1) That the Court quiet title to the real property located at 3048 Meadowbrook Blvd., Cleveland Heights, Ohio, Parcel Number 686-09-094;
- (2) That the Court declare the transfer of the property from the title of Anthony Viola constituted a fraudulent conveyance of the property and return the title to the Plaintiff;
- (3) That the Court declare that the Defendants are prevented from obstructing, interfering with, or infringing upon the Plaintiff's quiet enjoyment of the property;
- (4) That the Plaintiff be awarded its costs and attorney's fees incurred; and
- (5) For such further and other relief as the Court may deem just and proper.

CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information and belief that this complaint: (1) Is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) Is supported by existing law; (3) The factual contentions have evidentiary support; (4) All attachments hereto are authentic; and (5) The complaint complies with Rule 11.

Respectfully submitted,



Anthony Viola
2820 Mayfield Road # 205
Cleveland Heights, Ohio 44118
(330) 998-3290
MrTonyViola@icloud.com
June 7, 2021

Exhibit A

DEPARTMENT OF JUSTICE

NOTICE OF LIEN FOR FINE AND/OR RESTITUTION IMPOSED PURSUANT TO 18 UNITED STATES CODE §3613

United States Attorney's Office for the Northern District of Ohio

For Optional Use By Recording Office

CUYAHOGA COUNTY
OFFICE OF FISCAL OFFICER . 1
FJL 4/20/2012 1:52:55 PM
201204209010

NOTICE is hereby given of a lien against the property of the defendant named below. Pursuant to Title 18, United States Code, § 3613(c), a fine or an order of restitution imposed pursuant to the provisions of subchapter C of chapter 227 is a lien in favor of the United States upon all property belonging to the person fined or ordered to pay restitution. Pursuant to § 3613(d), a notice of lien shall be considered a notice of lien for taxes for the purposes of any State or local law providing for the filing of a tax lien. The lien arises at the time of the entry of judgment and continues until the liability is satisfied, remitted, or set aside, or until it becomes unenforceable pursuant to § 3613(b).

Name of Defendant
Anthony Viola

Court Number
1:08CR506

Residence
3048 Meadowbrook Blvd.
Cleveland Heights, OH 44118

Date of Judgment
January 5, 2012

Amount of Fine/Restitution
\$1,256,528.49 Restitution

Date of Entry of Judgment
January 12, 2012

Court Imposing Judgment
U. S. District Court, Northern District
of Ohio, Eastern Division

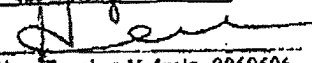
Rate of Interest: .12%

If payment becomes past due, penalties totaling up to 25 percent of the principal amount past due may arise. 18 U.S.C. § 3612(g).

IMPORTANT RELEASE INFORMATION--with respect to the lien listed above, this notice shall operate as a certificate of release pursuant to 18 U.S.C. § 3613(b) by operation of law, but no later than July 5, 2012.

PLACE OF FILING Cleveland, OH

This notice was prepared and signed at Cleveland, OH on this 24th day of February, 2012.


Heather Tensing Volosin, 0069606
Assistant U. S. Attorney

U. S. Attorney's Office
301 West Superior Avenue, Suite 400
Cleveland, OH 44113

Electronically Filed 02/24/2016 17:08 / CV 16 859482 / Confirmation Nbr. 680182 / CLMDW

Electronically Filed 02/25/2016 09:05 / SERVICE / CV 16 859482 / Confirmation Nbr. 680369 / CLDM2

Exhibit B

donated several properties to the Cuyahoga County Land Bank, and it was unclear whether any of the donated properties were also involved in this case and/or at what value the County had appraised the properties. (ECF # 48). None of the properties donated by defendant Gofman were properties involved in this case and, therefore, there are no further reductions, or “credits against loss”, based on the donated properties. (ECF # 48). For the foregoing reasons, the Government’s Proposed Restitution Order shall be ENTERED. (ECF # 48). Each defendant is so ordered to pay restitution in the following amount set forth below:

| DEFENDANT | TOTAL RESTITUTION | AMOUNT TO VICTIM LENDERS | JOINT & SEVERAL WITH |
|------------|-------------------|---|--|
| Uri Gofman | \$2,649,865 | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O. Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | Anthony Viola, Nicholas Myles, David Pirichy, Anthony Capuozzo, and Kathryn Clover |


| | | | |
|-----------------------|--------------------|---|---|
| <p>Anthony Viola</p> | <p>\$2,649,865</p> | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O. Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | <p>Uri Goffman, Nicholas Myles, David Pirichy, Anthony Capuozzo, and Kathryn Clover</p> |
| <p>Nicholas Myles</p> | <p>\$2,649,865</p> | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O.</p> | <p>Uri Gofman, Anthony Viola, David Pirichy, Anthony Capuozzo, and Kathryn Clover</p> |

| | | | |
|------------------|-------------|---|--|
| | | <p>Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | |
| David Pirichy | \$2,649,865 | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O. Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | <p>Uri Gofman, Anthony Viola, Nicholas Myles, Anthony Capuozzo, and Kathryn Clover</p> |
| Anthony Capuozzo | \$2,649,865 | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA</p> | <p>Uri Gofman, Anthony Viola, Nicholas Myles, David Pirichy, and Kathryn Clover</p> |

| | | | |
|-------------------|-------------|---|---|
| | | <p>#121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O. Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | |
| Kathryn Clover | \$2,649,865 | <p>\$774,910 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> <p>\$1,384,335 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, TX 75397-1774</p> <p>\$326,220 – Mortgage IT c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> <p>\$77,400 – New Century c/o Select Portfolio, Inc., Attn: Remittance Processing, P.O. Box 65450, Salt Lake City, UT 84165-0450; and,</p> <p>\$87,000 – New Century c/o Ocwen Loan Servicing, LLC, Attn: Cashiering Dept., 1661 Worthington Road, Suite 100, West Palm Beach, FL 33409</p> | Uri Gofman, Anthony Viola, Nicholas Myles, David Pirichy, and Anthony Capuozzo |
| Paul Lesniak | \$1,487,230 | <p>\$386,900 – Argent, 2677 North Main Street, Suite #1050, Santa Ana, CA 92705</p> | Uri Gofman, Anthony Viola, Nicholas Myles, David Pirichy, Anthony |

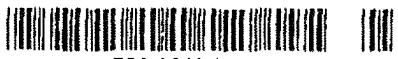
| | | | |
|--|--|--|--|
| | | <p>\$845,820 – Long Beach c/o FDIC Restitution Payments, P.O. Box 971774, Dallas, Texas 75397-1774</p> <p>\$254,510 – Mortgage II c/o Wells Fargo Bank NA, ABA #121000248, Account Name: Service Holding, Attention: Penni Cooley, San Francisco, CA</p> | <p>Capuozzo and Kathryn Clover</p> |
|--|--|--|--|

IT IS SO ORDERED.


DONALD C. NUGENT
United States District Judge

DATED: July 11, 2012

Exhibit C



72366434

IN THE COURT OF COMMON PLEAS
CUYAHOGA COUNTY, OHIO

THE STATE OF OHIO
Plaintiff

URI GOFMAN
Defendant

2012 FEB 14 P 12:24

Case No: CR-11-557589-A

Judge: DANIEL GAUL

GERALD E. FUERST
CLERK OF COURTS
CUYAHOGA COUNTY

INDICT: 2913.02 THEFT; AGGRAVATED THEFT
1315.55 ADDITIONAL MONEY LAUNDERING
PROHIBITIONS
2913.42 TAMPERING WITH RECORDS
ADDITIONAL COUNTS...

JOURNAL ENTRY

DEFENDANT IN COURT. COUNSEL MICHAEL J GOLDBERG PRESENT.
COURT REPORTER PRESENT.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO THEFT; AGGRAVATED THEFT 2913.02 A(3) F2 AS CHARGED IN COUNT(S) 1 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO ADDITIONAL MONEY LAUNDERING PROHIBITIONS 1315.55 A(3) F3 AS CHARGED IN COUNT(S) 2, 10 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO TAMPERING WITH RECORDS 2913.42 A(1) F3 AS CHARGED IN COUNT(S) 3 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO TAMPERING WITH RECORDS 2913.42 A(2) F4 AS CHARGED IN COUNT(S) 4 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO TAMPERING WITH RECORDS 2913.42 A(1) F4 AS CHARGED IN COUNT(S) 5, 6, 7, 8 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO TELECOMMUNICATIONS FRAUD 2913.05 A F4 AS CHARGED IN COUNT(S) 9 OF THE INFORMATION.

ON A FORMER DAY OF COURT THE DEFENDANT PLEAD GUILTY TO ENGAGING IN PATTERN OF CORRUPT ACTIVITY; FORFEITURE 2923.32 A(1) F3 AS CHARGED IN COUNT(S) 11 OF THE INFORMATION.

DEFENDANT TO FORFEIT TO THE STATE: 2722 SCARBOROUGH TO CUYAHOGA COUNTY LANDBANK; \$600,000.00 TO STATE OF OHIO.

THE COURT CONSIDERED ALL REQUIRED FACTORS OF THE LAW.

THE COURT FINDS THAT PRISON IS CONSISTENT WITH THE PURPOSE OF R. C. 2929.11.

THE COURT IMPOSES A PRISON SENTENCE AT THE LORAIN CORRECTIONAL INSTITUTION OF 5 YEAR(S).

3 YEARS ON COUNT 1; 1 YEAR ON COUNTS 2, 3, 4, 5, 6, 7, 8, 9 AND 10; 5 YEARS ON COUNT 11. COUNTS 1 AND 11 TO RUN CONSECUTIVE TO EACH OTHER, FOR A TOTAL OF 8 YEARS. REMAINING COUNTS RUN CONCURRENT TO EACH OTHER AND CONCURRENT TO COUNTS 1 AND 11.

DEFENDANT TO REPORT TO FEDERAL PRISON OR COUNTY JAIL BY 2-15-12. STATE TIME TO RUN CONCURRENT TO FEDERAL TIME ON

1:8 CR 00506. NO STATE DETAINER.

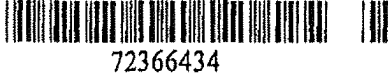
POST RELEASE CONTROL IS PART OF THIS PRISON SENTENCE FOR 5 YEARS MANDATORY FOR THE ABOVE FELONY(S) UNDER R.C.2967.28. DEFENDANT ADVISED THAT IF POST RELEASE CONTROL SUPERVISION IS IMPOSED FOLLOWING HIS/HER RELEASE FROM PRISON AND IF HE/SHE VIOLATES THAT SUPERVISION OR CONDITION OF POST RELEASE CONTROL UNDER RC 2967.131(B), PAROLE BOARD MAY IMPOSE A PRISON TERM AS PART OF THE SENTENCE OF UP TO ONE-HALF OF THE STATED PRISON TERM ORIGINALLY IMPOSED UPON THE OFFENDER.

UNLESS THE DEFENDANT IS SERVING A PRISON TERM THAT CANNOT BE REDUCED UNDER THE LAW, DEFENDANT MAY BE ELIGIBLE TO EARN 1 OR 5 DAYS CREDIT TOWARDS HIS/HER SENTENCE FOR EACH COMPLETED MONTH DURING WHICH THE DEFENDANT PARTICIPATES IN EDUCATIONAL OR OTHER PROGRAMS. IN ADDITION, THE DEFENDANT MAY EARN UP TO 5 DAYS CREDIT TOWARDS HIS/HER SENTENCE FOR SUCCESSFUL COMPLETION OF A SECOND SUCH PROGRAM. THIS EARNED CREDIT IS NOT AUTOMATIC BUT MUST

Sheriff Signature

LONGT

Uri Hofman
CR 557589



BE EARNED BY THE DEFENDANT.

ALL FEES WAIVED.

COSTS WAIVED

FINE(S) WAIVED.

RESTITUTION ORDERED IN THE AMOUNT OF \$1,000,000.00 TO ARGENT (OR ITS SUCCESSORS); PAYABLE THROUGH THE PROBATION DEPARTMENT.

02/08/2012

CPEDB 02/09/2012 08:41:02

Uri Hofman 2/14/12
Judge Signature Date

SENT

02/08/2012 Electronically Filed 01/26/2016 11:26 / / CV 16 857905 / Confirmation Nbr. 652247 / CLJML

Exhibit D

Customer Name:
Customer ID: FORF.20%

Receipt Number: 121113-2
Date: 12/11/13
Reference: 121113-2

ITEM / INVOICE

| <u>DESCRIPTION</u> | <u>QUANTITY</u> | <u>UNIT PRICE</u> | <u>AMOUNT</u> |
|---|-----------------|---------------------------------------|---------------|
| Dep to LETF - Restitution CR 535936 / Julius Graves | | | 2.50 |
| Dep to LETF - Restitution CR 535949 / Richard | | | 25.00 |
| Dep to LETF - Restitution CR 527972 / James Leonl | — | Viola (co-defendant) | 16.67 |
| Dep to LETF - Restitution CR 563627 / Sharon Stucko | | | 20.00 |
| Dep to LETF - Restitution CR 536179 / Edreaysa | | | 10.00 |
| Dep to LETF - Reimb CC Land Revltzn / Uri Gofman | — | Viola (co-defendant) GOFMAN | 88,590.05 |
| Dep to LETF - Dept Homeland Security v. Hasrouni | | | 7,852.39 |

Payment Method: Check

Subtotal: 88,516.61
Sales Tax: 0.00
88,516.61

Receipt Number: 121113-2
Date: 12/11/13
Reference: 121113-2

ITEM / INVOICE

| <u>DESCRIPTION</u> | <u>QUANTITY</u> | <u>UNIT PRICE</u> | <u>AMOUNT</u> |
|---|-----------------|-------------------|---------------|
| Dep to LETF - Restitution CR 535936 / Julius Graves | | | 2.50 |
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| Dep to LETF - Restitution CR 536179 / Edreaysa | | | 10.00 |
| Dep to LETF - Reimb CC Land Revltzn / Uri Gofman | | | 88,590.05 |
| Dep to LETF - Dept Homeland Security v. Hasrouni | | | 7,852.39 |

Payment Method: Check

Subtotal: 88,516.61
Sales Tax: 0.00
88,516.61

4/16/14 at 17:24:53.48

Page: 1

Cuyahoga County Prosecutor's Office
Cash Account Register
For the Period From Jan 1, 2012 to Dec 31, 2013
1000 - PNC-Law Enforcement

Filter Criteria includes: Report order is by Transaction Date.

| Date | Reference | Type | Payee/Paid By | Memo | Payment Am | Receipt Amt | Balance |
|---------|------------|------------|-----------------|-------|------------|-------------|------------|
| | | | Opening Balance | | | 375,152.76 | 375,152.76 |
| 1/1/12 | 07491 | Payment | cleohisup | | 100.00 | | 375,052.76 |
| 1/4/12 | 010412 | Payment | humrascou | | 100.00 | | 374,952.76 |
| 1/4/12 | 0104121 | Payment | paypal | | 16.48 | | 374,936.28 |
| 1/30/12 | 13012 | Recelpt | Forfeitures.20% | 13012 | | 3,487.82 | 378,424.10 |
| 1/30/12 | 130121 | Receipt | Forfeitures.20% | 13012 | | 7,029.23 | 385,453.33 |
| 1/31/12 | Annual Fee | Gen. Jrnl. | | | 1,686.86 | | 383,766.47 |
| 1/31/12 | 013112 | Payment | lawenf | | 0.70 | | 383,765.77 |
| 1/31/12 | 07432 | Payment | cleohisup | | 100.00 | | 383,665.77 |
| 1/31/12 | 07433 | Payment | cleohisup | | 100.00 | | 383,565.77 |
| 1/31/12 | 07434 | Payment | gerfuacle | | 50.00 | | 383,515.77 |
| 1/31/12 | 07435 | Payment | gerfuacle | | 50.00 | | 383,465.77 |
| 1/31/12 | 07436 | Payment | gerfuacle | | 50.00 | | 383,415.77 |
| 1/31/12 | 07437 | Payment | gerfuacle | | 50.00 | | 383,365.77 |
| 1/31/12 | 07438 | Payment | gerfuacle | | 50.00 | | 383,315.77 |
| 1/31/12 | 07439 | Payment | gerfuacle | | 50.00 | | 383,265.77 |
| 1/31/12 | 07440 | Payment | gerfuacle | | 50.00 | | 383,215.77 |
| 1/31/12 | 07441 | Payment | gerfuacle | | 50.00 | | 383,165.77 |
| 1/31/12 | 07442 | Payment | gerfuacle | | 50.00 | | 383,115.77 |
| 1/31/12 | 07443 | Payment | gerfuacle | | 50.00 | | 383,065.77 |
| 1/31/12 | 07444 | Payment | gerfuacle | | 50.00 | | 383,015.77 |
| 1/31/12 | 07445 | Payment | gerfuacle | | 50.00 | | 382,965.77 |
| 1/31/12 | 07446 | Payment | gerfuacle | | 50.00 | | 382,915.77 |
| 1/31/12 | 07447 | Payment | gerfuacle | | 50.00 | | 382,865.77 |
| 1/31/12 | 07448 | Payment | gerfuacle | | 50.00 | | 382,815.77 |
| 1/31/12 | 07449 | Payment | gerfuacle | | 50.00 | | 382,765.77 |
| 1/31/12 | 07450 | Payment | gerfuacle | | 50.00 | | 382,715.77 |
| 1/31/12 | 07451 | Payment | gerfuacle | | 50.00 | | 382,665.77 |
| 1/31/12 | 07452 | Payment | gerfuacle | | 50.00 | | 382,615.77 |
| 1/31/12 | 07453 | Payment | gerfuacle | | 50.00 | | 382,565.77 |
| 1/31/12 | 07454 | Payment | secofsta | | 5.00 | | 382,560.77 |
| 1/31/12 | 07455 | Payment | secofsta | | 5.00 | | 382,555.77 |
| 1/31/12 | 07457 | Payment | secofsta | | 5.00 | | 382,550.77 |
| 1/31/12 | 07458 | Payment | secofsta | | 5.00 | | 382,545.77 |
| 1/31/12 | 07459 | Payment | secofsta | | 5.00 | | 382,540.77 |
| 1/31/12 | 07460 | Payment | secofsta | | 5.00 | | 382,535.77 |
| 1/31/12 | 07461 | Payment | secofsta | | 5.00 | | 382,530.77 |
| 1/31/12 | 07462 | Payment | secofsta | | 5.00 | | 382,525.77 |
| 1/31/12 | 07463 | Payment | secofsta | | 5.00 | | 382,520.77 |
| 1/31/12 | 07464 | Payment | secofsta | | 5.00 | | 382,515.77 |
| 1/31/12 | 07465 | Payment | secofsta | | 5.00 | | 382,510.77 |
| 1/31/12 | 07466 | Payment | secofsta | | 5.00 | | 382,505.77 |
| 1/31/12 | 07467 | Payment | secofsta | | 5.00 | | 382,500.77 |
| 1/31/12 | 07468 | Payment | secofsta | | 5.00 | | 382,495.77 |
| 1/31/12 | 07469 | Payment | secofsta | | 5.00 | | 382,490.77 |
| 1/31/12 | 07470 | Payment | secofsta | | 5.00 | | 382,485.77 |
| 1/31/12 | 07471 | Payment | secofsta | | 5.00 | | 382,480.77 |
| 1/31/12 | 07472 | Payment | secofsta | | 5.00 | | 382,475.77 |
| 1/31/12 | 07473 | Payment | secofsta | | 5.00 | | 382,470.77 |
| 1/31/12 | 07474 | Payment | clecllaw | | 250.00 | | 382,220.77 |
| 1/31/12 | 07475 | Payment | flira | | 105.00 | | 382,115.77 |
| 1/31/12 | 07476 | Payment | flira | | 1,346.00 | | 380,769.77 |
| 1/31/12 | 07477 | Payment | mnjtec | | 930.20 | | 379,839.57 |
| 1/31/12 | 07478 | Payment | mnjtec | | 4,189.16 | | 375,650.42 |
| 1/31/12 | 07479 | Payment | mnjtec | | 1,793.60 | | 373,856.82 |
| 1/31/12 | 07480 | Payment | mnjtec | | 3,531.00 | | 370,325.82 |
| 1/31/12 | 07481 | Payment | cleohisup | | 100.00 | | 370,225.82 |
| 1/31/12 | 07458 | Void Pmnt | secofsta | | 5.00 | | 370,220.82 |
| 2/1/12 | 07529 | Payment | flira | | 790.60 | | 369,430.22 |
| 2/2/12 | 07482 | Payment | ptsame | | 332.50 | | 369,097.72 |
| 2/2/12 | 07483 | Payment | ptsame | | 1,025.05 | | 368,072.67 |
| 2/2/12 | 07484 | Payment | ptsame | | 707.75 | | 367,364.92 |

Electronically Filed 03/21/2016 10:56 / COMPLAINT / CV 16 857905 / Confirmation Nbr. 702078 / CLMDW

4/18/14 at 17:24:53.92

Cuyahoga County Prosecutor's Office
Cash Account Register
For the Period From Jan 1, 2012 to Dec 31, 2013
1000 - PNC-Law Enforcement

Filter Criteria includes: Report order is by Transaction Date.

| Date | Reference | Type | Payee/Paid By | Memo | Payment Am | Receipt Amt | Balance |
|---------|-----------|-----------|-----------------|--------|------------|-------------|------------|
| 8/28/12 | 07818 | Payment | ptsame | | 1,539.95 | | 398,325.39 |
| 8/28/12 | 07819 | Payment | ptsame | | 1,044.15 | | 397,281.24 |
| 8/28/12 | 07820 | Payment | ptsame | | 1,754.65 | | 395,526.59 |
| 8/28/12 | 082812 | Payment | was | | 112.10 | | 395,414.49 |
| 8/29/12 | 082812 | Payment | cleunista | | 350.00 | | 395,064.49 |
| 8/30/12 | 07822 | Payment | radbr | | 220.26 | | 394,844.21 |
| 8/30/12 | 07823 | Payment | buecar | | 799.65 | | 394,044.56 |
| 8/30/12 | 07824 | Payment | wllis | | 128.39 | | 393,916.18 |
| 8/30/12 | 07825 | Payment | sowgn | | 124.61 | | 393,793.57 |
| 8/30/12 | 07826 | Payment | gerfuecl | | 50.00 | | 393,743.57 |
| 8/30/12 | 07827 | Payment | gerfuecl | | 50.00 | | 393,693.57 |
| 8/30/12 | 07828 | Payment | gerfuecl | | 50.00 | | 393,643.57 |
| 8/30/12 | 07829 | Payment | gerfuecl | | 50.00 | | 393,593.57 |
| 8/30/12 | 07830 | Payment | gerfuecl | | 50.00 | | 393,543.57 |
| 8/30/12 | 07831 | Payment | gerfuecl | | 50.00 | | 393,493.57 |
| 8/30/12 | 07832 | Payment | gerfuecl | | 50.00 | | 393,443.57 |
| 8/30/12 | 07833 | Payment | gerfuecl | | 50.00 | | 393,393.57 |
| 8/30/12 | 07834 | Payment | gerfuecl | | 50.00 | | 393,343.57 |
| 8/30/12 | 07835 | Payment | gerfuecl | | 50.00 | | 393,293.57 |
| 8/30/12 | 07836 | Payment | gerfuecl | | 50.00 | | 393,243.57 |
| 8/30/12 | 07837 | Payment | gerfuecl | | 50.00 | | 393,193.57 |
| 8/30/12 | 07838 | Payment | gerfuecl | | 50.00 | | 393,143.57 |
| 8/30/12 | 07839 | Payment | gerfuecl | | 50.00 | | 393,093.57 |
| 8/30/12 | 07840 | Payment | gerfuecl | | 50.00 | | 393,043.57 |
| 8/30/12 | 07841 | Payment | gerfuecl | | 50.00 | | 392,993.57 |
| 8/30/12 | 07842 | Payment | gerfuecl | | 50.00 | | 392,943.57 |
| 8/30/12 | 07843 | Payment | gerfuecl | | 50.00 | | 392,893.57 |
| 8/30/12 | 07844 | Payment | gerfuecl | | 50.00 | | 392,843.57 |
| 8/30/12 | 07845 | Payment | gerfuecl | | 50.00 | | 392,793.57 |
| 8/30/12 | 083012 | Payment | altman | | 330.00 | | 392,463.57 |
| 8/30/12 | 07821 | Void Pmnt | cajui | | 50.00 | | 392,413.57 |
| 8/31/12 | 083112 | Receipt | Forfeitures.20% | 083112 | | 22,080.14 | 414,473.71 |
| 8/31/12 | 0831122 | Receipt | Forfeitures.20% | 083112 | | 733.65 | 415,207.36 |
| 8/31/12 | 0831123 | Receipt | Forfeitures.20% | 083112 | KARKA | 468,828.03 | 884,036.39 |
| 9/4/12 | 07847 | Payment | filtra | | 598.20 | | 883,438.19 |
| 9/4/12 | 07848 | Payment | filtra | | 1,041.20 | | 882,396.99 |
| 9/4/12 | 07849 | Payment | filtra | | 789.20 | | 881,607.79 |
| 9/4/12 | 07850 | Payment | wilang | | 97.01 | | 881,510.78 |
| 9/4/12 | 07851 | Payment | frijar | | 55.26 | | 881,455.52 |
| 9/4/12 | 07852 | Payment | woltob | | 8,457.62 | | 872,997.90 |
| 9/4/12 | 07853 | Payment | ohicse | | 88.00 | | 872,909.90 |
| 9/4/12 | 090412 | Payment | paypal | | 16.48 | | 872,893.42 |
| 9/4/12 | 07846 | Void Pmnt | filtra | | 598.60 | | 872,296.82 |
| 9/4/12 | 07846V | Void Pmnt | filtra | | 100.00 | | 872,196.82 |
| 9/5/12 | 07854 | Payment | cleohsup | | 100.00 | | 872,096.82 |
| 9/5/12 | 07855 | Payment | cleohsup | | 199.87 | | 872,893.42 |
| 9/5/12 | 07856 | Payment | nicand | | 289.79 | | 872,493.56 |
| 9/5/12 | 07857 | Payment | nicand | | 360.00 | | 872,203.76 |
| 9/5/12 | 07858 | Payment | clemet | | 416.52 | | 871,843.76 |
| 9/5/12 | 07859 | Payment | wille | | 128.21 | | 871,427.24 |
| 9/5/12 | 07860 | Payment | matter | | 200.00 | | 871,301.03 |
| 9/6/12 | 07861 | Payment | ohsupcou | | 515.85 | | 871,101.03 |
| 9/6/12 | 07862 | Payment | ptsame | | 220.26 | | 870,880.77 |
| 9/6/12 | 07863 | Payment | radbr | | 1,881.00 | | 870,364.80 |
| 9/6/12 | 07864 | Payment | filtra | | 896.20 | | 868,873.90 |
| 9/7/12 | 07865 | Payment | filtra | | 630.20 | | 867,977.70 |
| 9/7/12 | 07866 | Payment | filtra | | 520.00 | | 867,347.50 |
| 9/7/12 | 07867 | Payment | clerapri | | 577.17 | | 866,827.50 |
| 9/7/12 | 090713 | Payment | webslo | | 492.00 | | 866,250.33 |
| 9/10/12 | 07868 | Payment | tersim | | 114.00 | | 865,758.33 |
| 9/10/12 | 07869 | Payment | norcoabah | | 100.00 | | 865,844.33 |
| 9/10/12 | 091012 | Payment | cleohsup | | 100.00 | | 865,460.89 |
| 9/12/12 | 07870 | Payment | cleohsup | | 100.00 | | 865,350.89 |

Electronically filed 03/21/2015 09:55 AM COMPLAINT / CV 18 857905 / Confirmation Number 1808678 / CLMDW

**Cuyahoga County Prosecutor's Office
Cash Account Register
For the Period From Jan. 1, 2012 to Dec 31, 2013
1000 - PNC-Law Enforcement**

Filter Criteria includes: Report order is by Transaction Date.

| Date | Reference | Type | Payee/Paid By | Memo | Payment Am | Receipt Amt | Balance |
|---------|-----------|-----------|-----------------|--------|------------|-------------|--------------|
| 5/7/13 | 08812 | Payment | ptsame | | 601.36 | | 1,234,664.49 |
| 5/7/13 | 08813 | Payment | ptsame | | 1,184.85 | | 1,233,379.64 |
| 5/7/13 | 08814 | Payment | ptsame | | 406.65 | | 1,232,972.99 |
| 5/7/13 | 08816 | Payment | ptsame | | 325.00 | | 1,232,647.99 |
| 5/7/13 | 08816 | Payment | ptsame | | 494.00 | | 1,232,153.99 |
| 5/7/13 | 08817 | Payment | ptsame | | 606.16 | | 1,231,547.83 |
| 5/7/13 | 08818 | Payment | ptsame | | 325.00 | | 1,231,222.83 |
| 5/7/13 | 08819 | Payment | ptsame | | 1,237.85 | | 1,229,984.98 |
| 5/7/13 | 08820 | Payment | ptsame | | 325.00 | | 1,229,659.98 |
| 5/7/13 | 08821 | Payment | ptsame | | 325.00 | | 1,229,334.98 |
| 5/7/13 | 08822 | Payment | cuycouland | GOFMAN | 77,868.44 | | 1,151,466.54 |
| 5/7/13 | 08823 | Payment | buscar | | 748.32 | | 1,150,718.22 |
| 5/7/13 | 08824 | Payment | accdata | | 12,810.00 | | 1,137,908.22 |
| 5/7/13 | 08825 | Payment | kadan | | 260.46 | | 1,137,647.76 |
| 5/7/13 | 08826 | Payment | secofata | | 5.00 | | 1,137,642.76 |
| 5/7/13 | 08827 | Payment | secofata | | 5.00 | | 1,137,637.76 |
| 5/7/13 | 08828 | Payment | secofata | | 5.00 | | 1,137,632.76 |
| 5/7/13 | 08829 | Payment | secofata | | 5.00 | | 1,137,627.76 |
| 5/7/13 | 08830 | Payment | secofata | | 5.00 | | 1,137,622.76 |
| 5/7/13 | 08831 | Payment | secofata | | 5.00 | | 1,137,617.76 |
| 5/7/13 | 08832 | Payment | secofata | | 5.00 | | 1,137,612.76 |
| 5/7/13 | 08833 | Payment | secofata | | 5.00 | | 1,137,607.76 |
| 5/7/13 | 08834 | Payment | secofata | | 5.00 | | 1,137,602.76 |
| 5/7/13 | 08836 | Payment | secofata | | 5.00 | | 1,137,597.76 |
| 5/7/13 | 08838 | Payment | secofata | | 5.00 | | 1,137,592.76 |
| 5/7/13 | 08837 | Payment | secofata | | 5.00 | | 1,137,587.76 |
| 5/7/13 | 08838 | Payment | secofata | | 5.00 | | 1,137,582.76 |
| 5/7/13 | 08839 | Payment | secofata | | 5.00 | | 1,137,577.76 |
| 5/7/13 | 08840 | Payment | secofata | | 5.00 | | 1,137,572.76 |
| 5/7/13 | 08841 | Payment | secofata | | 5.00 | | 1,137,567.76 |
| 5/7/13 | 08842 | Payment | secofata | | 5.00 | | 1,137,562.76 |
| 5/7/13 | 08843 | Payment | secofata | | 5.00 | | 1,137,557.76 |
| 5/7/13 | 08844 | Payment | secofata | | 5.00 | | 1,137,552.76 |
| 5/7/13 | 08845 | Payment | secofata | | 5.00 | | 1,137,547.76 |
| 5/7/13 | 08846 | Payment | cuycoucle | | 50.00 | | 1,137,497.76 |
| 5/7/13 | 08847 | Payment | cuycoucle | | 50.00 | | 1,137,447.76 |
| 5/7/13 | 08848 | Payment | cuycoucle | | 50.00 | | 1,137,397.76 |
| 5/7/13 | 08849 | Payment | cuycoucle | | 50.00 | | 1,137,347.76 |
| 5/7/13 | 08850 | Payment | cuycoucle | | 50.00 | | 1,137,297.76 |
| 5/7/13 | 08851 | Payment | cuycoucle | | 50.00 | | 1,137,247.76 |
| 5/7/13 | 08852 | Payment | cuycoucle | | 50.00 | | 1,137,197.76 |
| 5/7/13 | 08853 | Payment | cuycoucle | | 50.00 | | 1,137,147.76 |
| 5/7/13 | 08854 | Payment | cuycoucle | | 50.00 | | 1,137,097.76 |
| 5/7/13 | 08855 | Payment | cuycoucle | | 50.00 | | 1,137,047.76 |
| 5/7/13 | 08856 | Payment | cuycoucle | | 50.00 | | 1,136,997.76 |
| 5/7/13 | 08857 | Payment | cuycoucle | | 50.00 | | 1,136,947.76 |
| 5/7/13 | 08858 | Payment | cuycoucle | | 50.00 | | 1,136,897.76 |
| 5/7/13 | 08859 | Payment | cuycoucle | | 50.00 | | 1,136,847.76 |
| 5/7/13 | 050713 | Receipt | Forfeitures.20% | 050713 | | 13,439.48 | 1,150,287.24 |
| 5/7/13 | 08860 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,237.24 |
| 5/7/13 | 08861 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,187.24 |
| 5/7/13 | 08862 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,137.24 |
| 5/7/13 | 08863 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,087.24 |
| 5/7/13 | 08864 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,037.24 |
| 5/7/13 | 08865 | Void Pmnt | cuycoucle | | 50.00 | | 1,150,000.00 |
| 5/10/13 | 051013 | Payment | bankofamerica | | 748.32 | | 1,149,251.68 |
| 5/13/13 | 081313 | Payment | -assample | | 81.88 | | 1,149,169.80 |
| 5/14/13 | 08866 | Payment | diocla | | 626.20 | | 1,148,543.60 |
| 5/15/13 | 051513 | Payment | -assample | | 1,969.00 | | 1,146,574.60 |
| 5/16/13 | 08867 | Payment | litra | | 954.50 | | 1,145,620.10 |
| 5/16/13 | 08868 | Void Pmnt | patjos | | 327.89 | | 1,145,292.21 |
| 5/16/13 | 08869 | Payment | parhelpol | | 40,000.00 | | 1,145,292.21 |
| 5/16/13 | 08869 | Payment | parhelpol | | 40,000.00 | | 1,105,292.21 |

4/16/14 at 17:24:54.40

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Cuyahoga County Prosecutor's Office
Cash Account Register
For the Period From Jan 1, 2012 to Dec 31, 2013
1000 - PNC-Law Enforcement

Filter Criteria includes: Report order is by Transaction Data.

| Date | Reference | Type | Payer/Paid By | Memo | Payment Am | Receipt Amt | Balance |
|---------|-----------|----------|-------------------|--------------|------------|-------------|------------|
| 8/19/13 | | Payment | sheraton | | 3,885.68 | | 805,601.15 |
| 8/20/13 | 08983 | Payment | cuycoulard | URI GOFMAN | 23,010.00 | | 782,491.15 |
| 8/20/13 | 08984 | Payment | blyvo | | 105.20 | | 782,385.95 |
| 8/20/13 | 08985 | Payment | szpet | | 180.29 | | 782,205.67 |
| 8/20/13 | 08986 | Payment | whijos | | 218.03 | | 781,987.64 |
| 8/20/13 | 08987 | Payment | karkol | | 338.01 | | 781,649.63 |
| 8/20/13 | 08988 | Payment | zarsco | | 269.02 | | 781,380.61 |
| 8/20/13 | 08989 | Payment | sowker | | 281.78 | | 781,118.83 |
| 8/20/13 | 08990 | Payment | goltra | | 231.94 | | 780,886.89 |
| 8/20/13 | 08991 | Payment | debtor | | 434.08 | | 780,452.81 |
| 8/20/13 | 08992 | Payment | thoang | | 322.07 | | 780,130.74 |
| 8/20/13 | 08993 | Payment | mogtim | | 894.31 | | 779,236.43 |
| 8/20/13 | 08994 | Payment | Intrasco | | 22,302.33 | | 756,934.12 |
| 8/20/13 | 082013 | Receipt | NET PROCEEDS | 082013 | | 4,184.55 | 761,088.67 |
| 8/20/13 | 082013-3 | Receipt | ICAC REIMBRSMNT | 082013-3 | | 365.00 | 761,453.67 |
| 8/20/13 | 082013-4 | Receipt | GEN FUND REIMBRSM | 082013-4 | | 42,718.89 | 804,172.56 |
| 8/21/13 | 082113 | Receipt | NET PROCEEDS | 082113 | | 25.00 | 804,197.56 |
| 8/28/13 | | Payment | Comfort Inn | Slmnt Chgs f | 187.88 | | 804,009.68 |
| 8/27/13 | 082713 | Receipt | NET PROCEEDS | 082713 | | 10,729.20 | 814,738.88 |
| 8/27/13 | 082713-2 | Receipt | NET PROCEEDS | 082713-2 | | 986.00 | 815,724.88 |
| 8/28/13 | | Payment | cropla | | 6,487.90 | | 810,236.98 |
| 8/28/13 | | Payment | wabato | | 330.15 | | 809,906.83 |
| 8/28/13 | 08995 | Payment | katken | | 6,000.00 | | 803,906.83 |
| 8/30/13 | 08998 | Payment | ohisupcou | | 100.00 | | 803,806.83 |
| 8/30/13 | 08997 | Payment | ohisupcou | | 100.00 | | 803,706.83 |
| 8/30/13 | 08999 | Payment | secofsta | | 5.00 | | 803,701.83 |
| 8/30/13 | 09000 | Payment | secofsta | | 5.00 | | 803,696.83 |
| 8/30/13 | 09001 | Payment | secofsta | | 5.00 | | 803,691.83 |
| 8/30/13 | 09002 | Payment | secofsta | | 5.00 | | 803,686.83 |
| 8/30/13 | 09003 | Payment | secofsta | | 5.00 | | 803,681.83 |
| 8/30/13 | 09004 | Payment | secofsta | | 5.00 | | 803,676.83 |
| 8/30/13 | 09005 | Payment | secofsta | | 5.00 | | 803,671.83 |
| 8/30/13 | 09006 | Payment | secofsta | | 5.00 | | 803,666.83 |
| 8/30/13 | 09007 | Payment | secofsta | | 5.00 | | 803,661.83 |
| 8/30/13 | 09008 | Payment | secofsta | | 5.00 | | 803,656.83 |
| 8/30/13 | 09009 | Payment | secofsta | | 5.00 | | 803,651.83 |
| 8/30/13 | 09010 | Payment | secofsta | | 5.00 | | 803,646.83 |
| 8/30/13 | 09011 | Payment | secofsta | | 5.00 | | 803,641.83 |
| 8/30/13 | 09012 | Payment | secofsta | | 5.00 | | 803,636.83 |
| 8/30/13 | 09014 | Payment | secofsta | | 5.00 | | 803,631.83 |
| 8/30/13 | 09015 | Payment | secofsta | | 5.00 | | 803,626.83 |
| 8/30/13 | 08860V | Void Pmt | cuycoucle | | -50.00 | | 803,576.83 |
| 8/30/13 | 08861V | Void Pmt | cuycoucle | | -50.00 | | 803,526.83 |
| 8/30/13 | 08862V | Void Pmt | cuycoucle | | -50.00 | | 803,476.83 |
| 8/30/13 | 08863V | Void Pmt | cuycoucle | | -50.00 | | 803,426.83 |
| 8/30/13 | 08864V | Void Pmt | cuycoucle | | -50.00 | | 803,376.83 |
| 8/30/13 | 08865V | Void Pmt | cuycoucle | | -50.00 | | 803,326.83 |
| 8/30/13 | 08998 | Void Pmt | secofsta | | 100.00 | | 803,426.83 |
| 8/30/13 | 09007 | Void Pmt | secofsta | | 100.00 | | 803,526.83 |
| 8/30/13 | 09007V | Void Pmt | secofsta | | -100.00 | | 803,426.83 |
| 8/30/13 | 09013 | Void Pmt | secofsta | | 5.00 | | 803,431.83 |
| 8/30/13 | 09016 | Void Pmt | bogphi | | 9,500.00 | | 794,376.83 |
| 9/3/13 | | Payment | hyareg | | 1,740.00 | | 792,636.83 |
| 9/3/13 | 09017 | Void Pmt | ohisupcou | | 100.00 | | 792,536.83 |
| 9/8/13 | | Payment | Design Pics, Inc. | McGInty Lap | 2,060.00 | | 790,476.83 |
| 9/8/13 | 090513 | Receipt | GEN FUND REIMBRSM | 080513 | | 22,302.33 | 812,779.16 |
| 9/8/13 | 090513.2 | Receipt | Forfeitures.20% | 080513-2 | | 1,413.20 | 814,192.36 |
| 9/8/13 | | Payment | Nat Org Vic Assl | | 680.00 | | 813,512.36 |
| 9/8/13 | 09018 | Payment | bogphi | | 8,250.00 | | 805,262.36 |
| 9/8/13 | 09019 | Payment | cornwl | | 1,190.77 | | 804,071.59 |
| 9/8/13 | 09020 | Payment | ochra | | 11,307.39 | | 792,764.20 |
| 9/8/13 | 09021 | Payment | sigdis | | 200.00 | | 792,564.20 |
| 9/8/13 | 09022 | Payment | celph | | 179.89 | | 792,384.31 |
| 9/8/13 | 09023 | Payment | howker | | 252.50 | | 792,058.81 |

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4/16/14 at 17:24:54.52

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**Cuyahoga County Prosecutor's Office
Cash Account Register
For the Period From Jan 1, 2012 to Dec 31, 2013
1000 - PNC-Law Enforcement**

Filter Criteria Includes: Report order is by Transaction Date.

| Date | Reference | Type | Payee/Paid By | Memo | Payment Am | Receipt Amt | Balance |
|----------|-----------|-----------|---------------------|----------|---------------------|-------------|--------------|
| 11/14/13 | 09151 | Payment | nicand | | 81.71 | | 827,331.92 |
| 11/14/13 | 09152 | Payment | smikes | | 285.51 | | 827,046.41 |
| 11/14/13 | 09153 | Payment | mckler | | 244.97 | | 826,801.44 |
| 11/14/13 | 09154 | Payment | ptsame | | 2,010.80 | | 824,790.64 |
| 11/14/13 | 09141 | Void Pmnt | parhelpol | | 59,540.00 | | 766,250.64 |
| 11/14/13 | 09141V | Void Pmnt | parhelpol | | -59,540.00 | | 824,790.64 |
| 11/14/13 | 09143 | Void Pmnt | ussecsr | | 81,830.00 | | 762,960.64 |
| 11/14/13 | 09143V | Void Pmnt | ussecsr | | -81,830.00 | | 824,790.64 |
| 11/18/13 | 111513 | Receipt | GEN FUND | 111513 | | 7,138.03 | 831,928.67 |
| 11/18/13 | 111513-2 | Receipt | FORF.20% | 111513-2 | | 32,307.48 | 864,236.35 |
| 11/18/13 | 111513-3 | Receipt | ICAC | 111513-3 | | 2,841.48 | 867,077.83 |
| 11/18/13 | 111513-4 | Receipt | DTAC | 111513-4 | | 23,010.00 | 890,087.83 |
| 11/18/13 | 111513-5 | Receipt | GROSS PROCEEDS | 111513-5 | | 124,311.54 | 1,014,399.37 |
| 11/18/13 | | Payment | acttra | | 385.00 | | 1,014,014.37 |
| 11/18/13 | | Payment | usair | | 5,079.00 | | 1,008,935.37 |
| 11/18/13 | 09155 | Payment | clomet | | 50.00 | | 1,008,885.37 |
| 11/18/13 | 111813 | Receipt | BANK CREDIT | 111813 | | 17.85 | 1,008,903.22 |
| 11/19/13 | 09156 | Payment | parhelpol | | 14,482.08 | | 994,441.16 |
| 11/19/13 | 09157 | Payment | ohlinvuni | | 15,018.29 | | 979,422.87 |
| 11/19/13 | 09158 | Payment | ussecsr | | 15,018.29 | | 864,404.58 |
| 11/19/13 | 09159 | Payment | ohsupcou | | 100.00 | | 864,304.58 |
| 11/19/13 | 09160 | Payment | ohsupcou | | 100.00 | | 964,204.58 |
| 11/20/13 | 112013 | Receipt | GROSS PROCEEDS | 112013 | | 44,498.85 | 1,008,703.23 |
| 11/20/13 | 112013-2 | Receipt | FORF.20% | 112013-2 | | 13,624.88 | 1,022,327.89 |
| 11/20/13 | 112013-3 | Receipt | BANK CREDIT | 112013-3 | | 839.60 | 1,023,167.49 |
| 11/21/13 | | Payment | usdis | | 400.00 | | 1,022,767.49 |
| 11/21/13 | 09161 | Payment | ohlosup | | 100.00 | | 1,022,667.49 |
| 11/21/13 | 09162 | Payment | ptsame | | 4,340.80 | | 1,018,326.69 |
| 11/21/13 | 112113 | Receipt | BANK CREDIT | 112113 | | 419.80 | 1,018,746.39 |
| 11/22/13 | | Payment | United Airlines | | 512.00 | | 1,018,234.39 |
| 11/25/13 | | Payment | acttra | | 35.00 | | 1,018,199.39 |
| 11/25/13 | | Payment | amair | | 763.60 | | 1,017,435.79 |
| 11/25/13 | | Payment | hyareg | | 393.56 | | 1,017,042.23 |
| 11/25/13 | 09163 | Payment | ohlowho | | 19,840.00 | | 997,202.23 |
| 11/25/13 | 09164 | Payment | natdisatt | | 1,193.00 | | 996,009.23 |
| 11/25/13 | 09165 | Payment | ptsame | | 2,565.00 | | 993,444.23 |
| 11/25/13 | 112513 | Receipt | FORF.20% | 112513 | | 18,810.80 | 1,012,255.03 |
| 11/27/13 | 112713 | Receipt | FORF.20% | 112713 | | 131.50 | 1,012,386.53 |
| 11/27/13 | 112713-2 | Receipt | ICAC REIMBRMNT | 112713-2 | | 5,090.07 | 1,017,476.60 |
| 11/27/13 | 112713-3 | Receipt | GEN FUND | 112713-3 | | 2,384.13 | 1,019,860.73 |
| 11/29/13 | | Payment | natdisatt | | 7,200.00 | | 1,012,660.73 |
| 12/2/13 | | Payment | sheraton | | 1,458.00 | | 1,011,202.73 |
| 12/3/13 | 09166 | Payment | hyndslght | | 25,395.00 | | 985,807.73 |
| 12/3/13 | 09167 | Payment | spr | | 818.31 | | 984,989.42 |
| 12/4/13 | | Payment | acttra | | 38.00 | | 984,951.42 |
| 12/5/13 | | Payment | natdisatt | | 4,955.00 | | 979,996.42 |
| 12/5/13 | | Payment | sheraton | | 891.00 | | 979,105.42 |
| 12/6/13 | | Payment | spr | | 818.31 | | 978,287.11 |
| 12/10/13 | | Payment | sheraton | | 88.00 | | 978,199.11 |
| 12/10/13 | 09168 | Payment | buscar | | 1,006.21 | | 977,192.90 |
| 12/10/13 | 09169 | Payment | supcouchl | | 100.00 | | 977,092.90 |
| 12/10/13 | 09170 | Payment | ohlosup | | 100.00 | | 976,992.90 |
| 12/11/13 | 121113 | Receipt | ICAC REIMBRMNT | 121113 | | 1,648.10 | 978,637.00 |
| 12/11/13 | 121113-2 | Receipt | FORF.20% | 121113-2 | | *96,519.61 | 1,075,156.61 |
| 12/11/13 | 121113-3 | Receipt | GEN FUND | 121113-3 | SEE DETAIL ATTACHED | 28,233.00 | 1,103,389.61 |
| 12/11/13 | 121113-4 | Receipt | BANK CREDIT | 121113-4 | | 98.39 | 1,103,488.00 |
| 12/12/13 | 09171 | Payment | hamcou | | 3,098.00 | | 1,100,389.00 |
| 12/13/13 | | Payment | amair | | 821.80 | | 1,099,567.20 |
| 12/13/13 | | Payment | bankofamerica | | 1,006.21 | | 1,098,561.00 |
| 12/16/13 | | Payment | natbusns | | 199.00 | | 1,098,362.00 |
| 12/16/13 | | Payment | NJ Business Service | | 6.25 | | 1,098,355.75 |
| 12/16/13 | | Payment | sheraton | | 8,149.28 | | 1,090,206.47 |
| 12/16/13 | 09172 | Payment | wicand | | 177.41 | | 1,092,028.33 |

Electronically Filed 03/21/2016 10:56 AM COMPLAINT / CV 16 857905 / Confirmation No. 160978 / CLMDW

EXHIBIT F-06

Exhibit E

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 06/11/2009

To: Cleveland

From: Cleveland

CA/Forfeitures

Contact: PS [redacted]

b6 -
b7C

Approved By: [redacted] *AFK*

Drafted By: [redacted]

SWP

Case ID #: 329E-CV-71645-FF2

Title: ANTHONY L. VIOLA;
REALTY CORP OF AMERICA;
MORTGAGE FRAUD

Synopsis: Opening of file.

Details: Request the above sub FF2 file be opened to address the criminal indictment of a \$1,500,000.00 judgement against the subjects.

◆◆

*File opened
06-15-09
[Signature]*

UNCLASSIFIED

(6/25/09/ee)

329E-CV-71645-FF2;

(Rev. 05-01-2008)

UNCLASSIFIED

FEDERAL BUREAU OF INVESTIGATION

Precedence: ROUTINE

Date: 05/15/2009

To: Cleveland

From: Cleveland

OA/Forfeitures

Contact: PS [Redacted]

b6 -
b7C

Approved By: [Redacted]

Drafted By: [Redacted]

SWP

Case ID #: 329E-CV-71645-FF

Title: ANTHONY L. VIOLA;
REALTY CORP OF AMERICA;
MORTGAGE FRAUD

Synopsis: Opening of file.

Details: Request the above Sub FF file be opened to address general forfeiture information generated through this criminal investigation.

◆◆

*Subfile opened
05.26.09 [Signature]*

UNCLASSIFIED

(12544024)

15-cv-00242-6976

329E-CV-71645-FF1

FEDERAL BUREAU OF INVESTIGATION
Forfeiture/Seizure Property

To: Finance Division
Procurement Section/Forfeiture & Seized Property Unit

Date: 05/26/2009

Attn:

b6 -
b7C

From: SAC, CLEVELAND

Entry (Check One)
 New Case
 Change or Additional

Case ID # 329E-CV-71645 FF

Seizure #: 3170-2009-S-0005

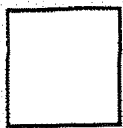
CATS Asset ID #: R09-FBI-00166

Subject: ANTHONY L. VIOLA; REALTY CORP OF AMERICA - MORTGAGE FRAUD.
(Case Title, Violation)

- CATS Standard Seizure Form
- FD-302
- Quick Release
- Indemnity Agreement
- Final Decree
- Receipt for Transfer/Disposition of Funds/Property
- Lab Reports
- Police Reports
- Title Documentation
- Appraisal Report
- Order Appointing Substitute Custodian
- NCIC
- Other Subsequent Material:
- Warrant of Arrest in Rem
- Complaint in Forfeiture
- Search Warrant
- Affidavit
- Seizure Warrant
- Plea Agreement
- Sharing Request Attachment
 - DAG 71
 - DAG 72
- Petition
- Claim
- Petition Investigation
- Civil Forfeiture Report
- USM 102

SUPERSEDING INDICTMENT

1 - FBIHQ (Encl. 2)
1 - Field Office
SWP: bld
(2)



SP

PFK

[Handwritten initials]

b6 -1
b7C -

UPLOADED _____
CLASS LEVEL C S SN TS U

15-cv-00242-70

329E-CV-71645-FF

**United States District Court
Northern District of Ohio – Eastern Division**

Anthony L. Viola,

Case No. _____

Plaintiff

INITIAL DISCLOSURES
(Fed. R. Civ. P. 26)

Complaint for Quiet Title,
28 U.S. Code § 2409

-vs.-

Cuyahoga County Land Bank,
et. al.,

Defendants

TO: Mark Bennett, Defendant:

Kindly provide the following information to the Plaintiff, at the address listed below, on or before June 30, 2021:

- (i) The name and, if known, the address and telephone number of each individual likely to have discoverable information -- along with the subjects of that information -- that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment; and
- (ii) A copy -- or a description by category and location -- of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

Thank you very much.

Respectfully Submitted,

Anthony Viola
2820 Mayfield Road # 205
Cleveland Heights, Ohio 44118
(330) 998-3290
MrTonyViola@icloud.com