

PREET BHARARA
United States Attorney for the
Southern District of New York
By: PAUL M. MONTELEONI
MARGARET GRAHAM
JAIMIE L. NAWADAY
CRISTINE I. PHILLIPS
Assistant United States Attorneys
One Saint Andrew's Plaza
New York, New York 10007
Telephone: (212) 637-2219/2923/2275/2696
Facsimile: (212) 637-0084
E-mail: paul.monteleoni@usdoj.gov
margaret.graham@usdoj.gov
jaimie.nawaday@usdoj.gov
cristine.phillips@usdoj.gov

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

<hr/>		:
		:
UNITED STATES OF AMERICA,		:
		:
Plaintiff,		:
		:
- against -		:
		:
PREVEZON HOLDINGS LTD.,		:
PREVEZON ALEXANDER, LLC,		:
PREVEZON SOHO USA, LLC,		:
PREVEZON SEVEN USA, LLC,		:
PREVEZON PINE USA, LLC,		:
PREVEZON 1711 USA, LLC,		:
PREVEZON 1810, LLC,		:
PREVEZON 2009 USA, LLC,		:
PREVEZON 2011 USA, LLC,		:
FERENCOI INVESTMENTS, LTD.,		:
KOLEVINS, LTD.,		:
		:
Defendants,		:
		:
ALL RIGHT, TITLE AND INTEREST		:
IN THE REAL PROPERTY AND		:
APPURTENANCES KNOWN AS THE 20		:
PINE STREET CONDOMINIUM, 20		:
PINE STREET, NEW YORK, NEW YORK		:

**SECOND AMENDED VERIFIED
COMPLAINT**

No. 13 Civ. 6326 (TPG)

ECF Case

10005, UNIT 1816 ("20 PINE STREET, UNIT 1816"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8293 HELD IN THE NAME OF PREVEZON ALEXANDER LLC (THE "PREVEZON ALEXANDER ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8084 HELD IN THE NAME OF PREVEZON SOHO USA LLC (THE "PREVEZON SOHO ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****6021 HELD IN THE NAME OF PREVEZON SEVEN USA LLC (THE "PREVEZON SEVEN ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8349 HELD IN THE NAME OF PREVEZON 1711 USA, LLC (THE "PREVEZON 1711 ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****9102 HELD IN THE NAME OF PREVEZON 2009 USA, LLC (THE "PREVEZON 2009 ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8242 HELD IN THE NAME OF PREVEZON PINE USA, LLC (THE "PREVEZON PINE ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****5882 HELD IN THE NAME OF PREVEZON 2011 USA, LLC (THE "PREVEZON 2011 ACCOUNT"),

ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER

*****9128 HELD IN THE NAME :
OF PREVEZON 1810 USA, LLC (THE :
"PREVEZON 1810 ACCOUNT"), :
:

APPROXIMATELY \$1,379,518.90 :
HELD BY THE UNITED STATES AS A :
SUBSTITUTE RES FOR ALL RIGHT, :
TITLE AND INTEREST IN THE REAL :
PROPERTY AND APPURTENANCES :
KNOWN AS THE 20 PINE STREET :
CONDOMINIUM, 20 PINE STREET, :
NEW YORK, NEW YORK 10005, UNIT :
2009 (THE "20 PINE STREET, UNIT :
2009 SALE PROCEEDS"), :

APPROXIMATELY \$4,429,019.44 :
HELD BY THE UNITED STATES AS A :
SUBSTITUTE RES FOR ALL RIGHT, :
TITLE AND INTEREST IN THE REAL :
PROPERTY AND APPURTENANCES :
KNOWN AS ALEXANDER CONDOMINIUM, :
250 EAST 49th STREET, NEW YORK, :
NEW YORK 10017, UNIT COMM3 (THE :
"250 EAST 49th STREET, UNIT :
COMM3 SALE PROCEEDS"), :

APPROXIMATELY \$1,046,530.04 :
HELD BY THE UNITED STATES AS A :
SUBSTITUTE RES FOR ALL RIGHT, :
TITLE AND INTEREST IN THE REAL :
PROPERTY AND APPURTENANCES :
KNOWN AS THE 20 PINE STREET :
CONDOMINIUM, 20 PINE STREET, :
NEW YORK, NEW YORK 10005, UNIT :
2308 (THE "20 PINE STREET, UNIT :
2308 SALE PROCEEDS"), :

APPROXIMATELY \$894,026.21 HELD :
BY THE UNITED STATES AS A :
SUBSTITUTE RES FOR ALL RIGHT, :
TITLE AND INTEREST IN THE REAL :
PROPERTY AND APPURTENANCES :
KNOWN AS THE 20 PINE STREET :
CONDOMINIUM, 20 PINE STREET, :
NEW YORK, NEW YORK 10005, UNIT :
1711 (THE "20 PINE STREET, UNIT :
1711 SALE PROCEEDS"), :

A DEBT OF 3,068,946 EUROS OWED :
BY AFI EUROPE N.V. TO PREVEZON :
HOLDINGS RESTRAINED BY THE :
GOVERNMENT OF THE NETHERLANDS :
ON OR ABOUT JANUARY 22, 2014 :
(THE "AFI EUROPE DEBT"), :
:
and all property traceable :
thereto, :
:
Defendants in Rem. :
:
:

Plaintiff the United States of America (the "Government"),
by its attorney Preet Bharara, United States Attorney for the
Southern District of New York, for its verified complaint (the
"Complaint") alleges, upon information and belief, as follows:

INTRODUCTION

1. This action is brought by the Government pursuant to
18 U.S.C. §§ 981(a)(1)(A), 985, and 1956(b)(1) seeking the
forfeiture of certain property involved in laundering the
proceeds of a Russian tax refund fraud scheme and the imposition
of civil money laundering penalties.

2. The Government's claims arise out of the laundering of
proceeds of a criminal enterprise in Russia in a complicated
series of transactions including real estate purchases in the
Southern District of New York. As set forth in more detail
below, upon information and belief, a Russian criminal
organization including corrupt Russian government officials (the
"Organization") defrauded Russian taxpayers of approximately 5.4

billion rubles, or approximately \$230 million in United States dollars, through an elaborate tax refund fraud scheme. After perpetrating this fraud, members of the Organization have undertaken illegal actions in order to conceal this fraud and retaliate against individuals who attempted to expose it. As a result of these retaliatory actions, Sergei Magnitsky, a Russian attorney who exposed the fraud scheme, was falsely arrested and died in pretrial detention. Members of the Organization, and associates of those members, have also engaged in a broad pattern of money laundering in order to conceal the proceeds of the fraud scheme. This money laundering activity has included the purchase of pieces of Manhattan real estate with funds commingled with fraud proceeds.

3. By this Complaint, the Government seeks forfeiture of all right, title and interest in the following property:

a. ALL RIGHT, TITLE AND INTEREST IN THE REAL PROPERTY AND APPURTENANCES KNOWN AS THE 20 PINE STREET CONDOMINIUM, 20 PINE STREET, NEW YORK, NEW YORK 10005, UNIT 1816 ("20 PINE STREET, UNIT 1816"),

b. ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8293 HELD IN THE NAME OF PREVEZON ALEXANDER LLC (THE "PREVEZON ALEXANDER ACCOUNT"),

c. ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER *****8084 HELD IN THE NAME OF PREVEZON SOHO USA LLC (THE "PREVEZON SOHO ACCOUNT"),

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