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9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,)
)
 12 Plaintiff,)
)
 13 v.) 2:12-CR-439-PMP-(PAL)
)
 14 EMMANOUIL VARAGIANNIS,)
 (aka Manny Varagiannis),)
 15)
 Defendant.)
 16

17 **BILL OF PARTICULARS FOR FORFEITURE OF PROPERTY**

18 The United States of America, by and through Daniel G. Bogden, United States Attorney for
 19 the District of Nevada, and Cristina D. Silva, Assistant United States Attorney, hereby files the
 20 following Bill of Particulars for Forfeiture of Property.

21 This Bill of Particulars for Forfeiture of Property is a clarification of, and is more
 22 specific than, the Forfeiture Allegation of the Criminal Indictment, and the United States hereby
 23 gives notice to the Defendant of this clarification and specificity with this Bill of Particulars
 24 concerning the Forfeiture of Property:

25 ...

26 ...

1 Parcel II:

2 An undivided 1/28 interest in and to the common area shown as common area
3 Phase 2 upon the Plat of Redrock Park Subdivision filed pursuant to the
4 provisions of N.R.S. 117.020 recorded in Book 33 of Plats, Page 19, in the
5 Official Records of the County Recorder, Clark County, Nevada and as defined in
6 that certain Declaration of Restrictions (Enabling Declaration establishing a plan
7 for condominium ownership of Redrock Park Subdivision) recorded November
8 21, 1985 in Book 2220 of Official Records, Clark County, Nevada as Document
9 No. 2179985.

10 Parcel III:

11 A non-exclusive easement for ingress and egress, public utilities and private
12 streets shown over Lot A (The Recreation Area) and common areas Phase One (1)
13 and Two (2) of the condominium project, as shown upon the Plat of Redrock Park
14 Subdivision filed pursuant to the provisions of N.R.S. 117.020 recorded in Book
15 33 of Plats, Page 19, in the Official Records of the County Recorder, Clark
16 County, Nevada and as defined in that certain Declaration of Restrictions
17 (Enabling Declaration establishing a plan for condominium ownership of Redrock
18 Park Subdivision) recorded November 21, 1985 in Book 2220 of Official
19 Records, Clark County, Nevada as Document No. 2179985.

20 Parcel IV:

21 An exclusive easement to use that portion of the Common Area designated as
22 Parking Space No. 6-A, as shown upon the Plat of Redrock Park Subdivision filed
23 pursuant to the provisions of N.R.S. 117.020 recorded in Book 33 of Plats, Page
24 19, in the Official Records of the County Recorder, Clark County, Nevada and as
25 defined in that certain Declaration of Restrictions (Enabling Declaration
26 establishing a plan for condominium ownership of Redrock Park Subdivision)

1 recorded November 21, 1985 in Book 2220 of Official Records, Clark County,
2 Nevada as Document No. 2179985.

3 Parcel ID: 163-12-110-021.

- 4 3) \$37,232.76 in United States Currency;
- 5 4) \$69,334.92 in United States Currency; and
- 6 5) \$83,942.00 in United States Currency

7 (“property”).

8 3. If any property being subject to forfeiture pursuant to Title 31, United States Code,
9 Section 5317(c)(1), as a result of any act or omission of the defendant –

- 10 a. cannot be located upon the exercise of due diligence;
- 11 b. has been transferred or sold to, or deposited with, a third party;
- 12 c. has been placed beyond the jurisdiction of the court;
- 13 d. has been substantially diminished in value; or
- 14 e. has been commingled with other property which cannot be divided without difficulty;

15 it is the intent of the United States of America, pursuant to Title 21, United States Code, Section
16 853(p), to seek forfeiture of any properties of the defendants for the *in personam* criminal forfeiture
17 money judgment of \$2,390,077.00 in United States Currency.

18 All pursuant to Title 31, United States Code, Sections 5313(a), 5324(a)(3), and 5317(c)(1);
19 and Title 21, United States Code, Section 853(p).

20 Dated this 6th day of June, 2013.

21 Respectfully submitted,

22 DANIEL G. BOGDEN
23 United States Attorney

24 /s/ Cristina D. Silva
25 CRISTINA D. SILVA
26 Assistant United States Attorney

PROOF OF SERVICE

I, Cristina D. Silva, certify that the following individuals were served with copies of the Bill of Particulars for Forfeiture of Property on June 6, 2013 by the below identified method of service:

CM/ECF

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/s/ Cristina D. Silva
CRISTINA D. SILVA
Assistant United States Attorney