

1 and did so as part of a pattern of illegal activity involving more than \$100,000.00 in a 12-
 2 month period:

3	<u>Date</u>	<u>Domestic Financial Institution</u>	<u>Account No.</u>	<u>Description of Transaction</u>
4	01/06/2009	Wells Fargo Bank	x7996	\$9,700.00
5	01/15/2009	Wells Fargo Bank	x7996	\$9,850.00
6	01/15/2009	SSSCU	x5769	\$9,665.00
7	02/04/2009	Wells Fargo Bank	x7996	\$9,956.00
8	02/10/2009	SSSCU	x5769	\$9,700.00
9	02/10/2009	Wells Fargo Bank	x7996	\$9,850.00
10	02/26/2009	SSSCU	X5769	\$9,550.00
11	03/10/2009	Wells Fargo Bank	x7996	\$9,800.00
12	03/10/2009	SSSCU	x5769	\$9,330.00
13	03/23/2009	SSSCU	x5769	\$9,800.00
14	03/31/2009	Wells Fargo Bank	x7996	\$8,000.00
15	03/31/2009	SSSCU	x5769	\$9,875.00
16	04/27/2009	SSSCU	x5769	\$9,900.00
17	05/18/2009	SSSCU	x5769	\$9,900.00
18	05/28/2009	Wells Fargo Bank	x7996	\$9,402.00
19	06/02/2009	SSSCU	x5769	\$9,500.00
20	06/02/2009	Wells Fargo Bank	x7996	\$9,500.00
21	06/09/2009	SSSCU	x5769	\$9,882.00
22	06/09/2009	Wells Fargo Bank	x7996	\$9,000.00
23	06/23/2009	SSSCU	x5769	\$9,500.00
24	06/23/2009	Wells Fargo Bank	x7996	\$9,500.00
25	07/02/2009	SSSCU	x5769	\$5,470.00

26

1	07/02/2009	Wells Fargo Bank	x7996	\$5,000.00
2	07/08/2009	SSSCU	x5769	\$9,500.00
3	07/08/2009	Wells Fargo Bank	x7996	\$9,500.00
4	07/16/2009	SSSCU	x5769	\$9,640.00
5	07/16/2009	Wells Fargo Bank	x7996	\$9,560.00
6	07/22/2009	Wells Fargo Bank	x7996	\$9,500.00
7	08/05/2009	Wells Fargo Bank	x7996	\$9,865.00
8	08/10/2009	SSSCU	x5769	\$9,500.00
9	08/10/2009	Wells Fargo Bank	x7996	\$3,500.00
10	09/08/2009	SSSCU	x5769	\$9,500.00
11	09/14/2009	SSSCU	x5769	\$5,000.00
12	09/14/2009	Wells Fargo Bank	x7996	\$6,070.00
13	10/06/2009	Wells Fargo Bank	x7996	\$6,000.00
14	10/06/2009	SSSCU	x5769	\$8,500.00
15	11/09/2009	SSSCU	x5769	\$7,269.00
16	11/09/2009	Wells Fargo Bank	x7996	\$6,000.00
17	11/23/2009	SSSCU	x5769	\$7,550.00
18	11/23/2009	Wells Fargo Bank	x7996	\$7,550.00
19	01/04/2010	SSSCU	x5769	\$9,505.00
20	01/19/2010	SSSCU	x5769	\$9,900.00
21	01/25/2010	SSSCU	x5769	\$8,850.00
22	01/25/2010	Wells Fargo Bank	x7996	\$7,020.00
23	02/08/2010	SSSCU	x5769	\$9,460.00
24	02/08/2010	Wells Fargo Bank	x7996	\$4,300.00
25	02/16/2010	SSSCU	x5769	\$8,848.00
26	02/16/2010	Wells Fargo Bank	x7996	\$1,250.00

1	02/22/2010	SSSCU	x5769	\$9,895.00
2	03/09/2010	SSSCU	x5769	\$9,640.00
3	03/24/2010	SSSCU	x5769	\$9,770.00
4	03/24/2010	Wells Fargo Bank	x7996	\$1,100.00
5	03/30/2010	SSSCU	x5769	\$5,000.00
6	03/30/2010	Wells Fargo Bank	x7996	\$8,715.00
7	04/05/2010	SSSCU	x5769	\$9,900.00
8	04/06/2010	Wells Fargo Bank	x7996	\$9,500.00
9	05/04/2010	Wells Fargo Bank	x7996	\$9,905.00
10	05/26/2010	SSSCU	X5769	\$9,845.00
11	06/01/2010	SSSCU	x5769	\$9,922.00
12	06/01/2010	Wells Fargo Bank	x7996	\$8,014.00
13	06/11/2010	SSSCU	x5769	\$2,805.00
14	06/11/2010	Wells Fargo Bank	x7996	\$9,915.00
15	06/14/2010	SSSCU	x5769	\$8,003.00
16	06/14/2010	Wells Fargo Bank	x7996	\$9,970.00
17	06/22/2010	SSSCU	x5769	\$9,675.00
18	06/30/2010	SSSCU	x5769	\$9,410.00
19	06/30/2010	Wells Fargo Bank	x7996	\$7,000.00
20	07/08/2010	SSSCU	x5769	\$9,950.00
21	07/20/2010	SSSCU	x5769	\$9,000.00
22	07/20/2010	SSSCU	x5769	\$900.00
23	07/20/2010	Wells Fargo Bank	x7996	\$5,912.00
24	08/10/2010	SSSCU	x5769	\$9,100.00
25	08/10/2010	Wells Fargo Bank	x7996	\$2,900.00
26	08/16/2010	SSSCU	x5769	\$1,200.00

1	08/16/2010	SSSCU	x5769	\$9,100.00
2	08/16/2010	Wells Fargo Bank	x7996	\$7,200.00
3	09/10/2010	SSSCU	x5769	\$9,240.00
4	09/10/2010	Wells Fargo Bank	x7996	\$9,600.00
5	09/23/2010	Wells Fargo Bank	x7996	\$9,920.00
6	10/01/2010	SSSCU	x5769	\$9,715.00
7	10/01/2010	Wells Fargo Bank	x7996	\$9,920.00
8	10/15/2010	Wells Fargo Bank	x7996	\$9,755.00
9	10/20/2010	SSSCU	x5769	\$6,500.00
10	10/20/2010	Wells Fargo Bank	x7996	\$9,215.00
11	10/27/2010	SSSCU	x5769	\$2,210.00
12	10/27/2010	Wells Fargo Bank	x7996	\$9,500.00
13	11/09/2010	SSSCU	x5769	\$1,000.00
14	11/09/2010	SSSCU	x5769	\$9,615.00
15	11/23/2010	SSSCU	x5769	\$9,040.00
16	01/06/2011	SSSCU	x5769	\$9,555.00
17	01/06/2011	Wells Fargo Bank	x7996	\$3,960.00
18	01/11/2011	SSSCU	x5769	\$9,415.00
19	01/19/2011	SSSCU	x5769	\$9,565.00
20	01/19/2011	Wells Fargo Bank	x7996	\$9,500.00
21	01/28/2011	SSSCU	x5769	\$9,620.00
22	01/28/2011	Wells Fargo Bank	x7996	\$9,770.00
23	02/02/2011	SSSCU	x5769	\$9,300.00
24	02/02/2011	Wells Fargo Bank	x7996	\$2,020.00
25	02/09/2011	SSSCU	x5769	\$9,940.00
26	02/09/2011	Wells Fargo Bank	x7996	\$9,855.00

1	02/16/2011	SSSCU	x5769	\$8,220.00
2	02/16/2011	Wells Fargo Bank	x7996	\$4,370.00
3	02/24/2011	Wells Fargo Bank	x7996	\$4,555.00
4	02/24/2011	SSSCU	x5769	\$9,590.00
5	03/03/2011	Wells Fargo Bank	x7996	\$5,720.00
6	03/03/2011	SSSCU	x5769	\$9,950.00
7	03/10/2011	Wells Fargo Bank	x7996	\$9,760.00
8	03/10/2011	SSSCU	x5769	\$9,750.00
9	03/18/2011	Wells Fargo Bank	x7996	\$4,012.00
10	03/18/2011	SSSCU	x5769	\$7,040.00
11	03/24/2011	Wells Fargo Bank	x7996	\$8,865.00
12	03/24/2011	SSSCU	x5769	\$9,651.00
13	03/29/2011	Wells Fargo Bank	x7996	\$9,925.00
14	04/05/2011	Wells Fargo Bank	x7996	\$9,842.00
15	04/22/2011	SSSCU	x5769	\$9,600.00
16	04/22/2011	Wells Fargo Bank	x7996	\$9,420.00
17	04/29/2011	Wells Fargo Bank	x7996	\$9,805.00
18	04/29/2011	SSSCU	x5769	\$7,180.00
19	04/29/2011	SSSCU	x5769	\$1,200.00
20	05/05/2011	Wells Fargo Bank	x7996	\$9,510.00
21	05/05/2011	SSSCU	x5769	\$9,640.00
22	05/13/2011	Wells Fargo Bank	x7996	\$8,250.00
23	05/27/2011	Wells Fargo Bank	x7996	\$9,850.00
24	05/13/2011	SSSCU	x5769	\$8,745.00
25	06/03/2011	Wells Fargo Bank	x7996	\$9,420.00
26	06/03/2011	SSSCU	x5769	\$7,675.00

1	06/10/2011	SSSCU	X5769	\$9,865.00
2	06/15/2011	Wells Fargo Bank	x7996	\$6,296.00
3	06/15/2011	SSSCU	x5769	\$9,851.00
4	07/05/2011	Wells Fargo Bank	x7996	\$9,940.00
5	07/14/2011	Wells Fargo Bank	x7996	\$9,805.00
6	07/14/2011	SSSCU	x5769	\$9,388.00
7	07/28/2011	Wells Fargo Bank	x7996	\$9,641.00
8	07/28/2011	SSSCU	x5769	\$9,521.00
9	08/04/2011	SSSCU	x5769	\$9,355.00
10	08/04/2011	Wells Fargo Bank	x7996	\$9,482.00
11	08/12/2011	SSSCU	x5769	\$9,030.00
12	08/12/2011	Wells Fargo Bank	x7996	\$9,044.00
13	08/17/2011	SSSCU	x5769	\$9,531.00
14	08/17/2011	Wells Fargo Bank	x7996	\$6,020.00
15	08/24/2011	SSSCU	x5769	\$8,983.00
16	08/24/2011	Wells Fargo Bank	x7996	\$5,595.00
17	09/15/2011	SSSCU	x5769	\$9,310.00
18	09/15/2011	Wells Fargo Bank	x7996	\$7,260.00
19	09/23/2011	SSSCU	x5769	\$9,220.00
20	09/23/2011	Wells Fargo Bank	x7996	\$9,715.00
21	10/01/2011	SSSCU	X5769	\$9,485.00
22	10/20/2011	SSSCU	x5769	\$7,520.00
23	10/20/2011	Wells Fargo Bank	x7996	\$8,170.00
24	11/10/2011	Wells Fargo Bank	x7996	\$9,903.00
25	11/16/2011	SSSCU	x5769	\$9,951.00
26	11/16/2011	Wells Fargo Bank	x7996	\$9,535.00

1	11/25/2011	Wells Fargo Bank	x7996	\$9,831.00
2	12/06/2011	SSSCU	x5769	\$9,905.00
3	12/06/2011	Wells Fargo Bank	x7996	\$9,535.00
4	12/22/2011	Wells Fargo Bank	x7996	\$9,535.00
5	01/09/2012	SSSCU	x5769	\$9,901.00
6	01/09/2012	Wells Fargo Bank	x7996	\$9,015.00
7	01/25/2012	Wells Fargo Bank	x7996	\$9,565.00
8	02/08/2012	SSSCU	x5769	\$8,403.00
9	02/08/2012	Wells Fargo Bank	x7996	\$9,550.00
10	02/16/2012	SSSCU	x5769	\$9,280.00
11	02/16/2012	Wells Fargo Bank	x7996	\$9,150.00
12	02/22/2012	SSSCU	x5769	\$5,050.00
13	02/22/2012	Wells Fargo Bank	x7996	\$9,610.00
14	03/13/2012	SSSCU	x5769	\$9,125.00
15	03/19/2012	SSSCU	x5769	\$9,940.00
16	03/19/2012	Wells Fargo Bank	x7996	\$9,680.00
17	03/28/2012	SSSCU	x5769	\$9,695.00
18	03/28/2012	Wells Fargo Bank	x7996	\$9,275.00
19	04/02/2012	Wells Fargo Bank	x7996	\$9,275.00
20	04/27/2012	Wells Fargo Bank	x7996	\$9,950.00
21	05/16/2012	Wells Fargo Bank	x7996	\$9,615.00
22	06/15/2012	Wells Fargo Bank	x7996	\$9,550.00
23	06/22/2012	Wells Fargo Bank	x7996	\$9,508.00
24	06/22/2012	SSSCU	x5769	\$6,000.00
25	07/11/2012	SSSCU	x5769	\$9,850.00
26	07/12/2012	Wells Fargo Bank	x7996	\$9,584.00

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

07/19/2012	Wells Fargo Bank	x7996	\$8,680.00
07/19/2012	SSSCU	x5769	\$8,680.00
08/16/2012	SSSCU	x5769	\$9,505.00
08/16/2012	SSSCU	x5769	\$1,200.00

All in violation of Title 31, United States Code, Sections 5324(a)(3) and (d)(2); Title 31, Code of Federal Regulations, Section 103.11; and Title 18, United States Code, Section 2.

**FORFEITURE ALLEGATION ONE
(Structuring Financial Transactions to Evade Reporting Requirements)**

1. The allegations contained in Count One of this Criminal Indictment are hereby realleged and incorporated herein by reference for the purpose of alleging forfeiture pursuant to Title 31, United States Code, Section 5317(c)(1).

2. Upon conviction of the felony offense charged in Count One of this Criminal Indictment,

EMMANOUIL VARAGIANNIS (aka Manny Varagiannis),

defendant herein, shall forfeit to the United States of America, all property, real or personal, involved in violations of Title 31, United States Code, Sections 5313(a) and 5324(a)(3), and any property traceable thereto, or a conspiracy to commit such violations, an *in personam* criminal forfeiture money judgment of \$2,390,077.00 in United States Currency, including:

- 1) Real Property located at 6225 Bellota Drive, Las Vegas, Nevada 89108, described as follows: Lot Seventeen (17) in Block One (1) of Sierra Oeste, as shown by Map thereof on filed in Book 31, of Plats, Page 18 in the Office of the County Recorder of Clark County, Nevada.

1 Parcel ID: 138-23-710-017; and

2 2) Real Property located at 2661 Red Rock Street, #101 Las Vegas,
3 Nevada 89146, described as follows:

4 Parcel I:

5 Unit A in Building 6 of Redrock Park Subdivision, a condominium
6 subdivision filed pursuant to the provisions of N.R.S. 117.020 recorded in
7 Book 33 of Plats, Page 19, in the Official Records of the County Recorder,
8 Clark County, Nevada and as defined in that certain Declaration of
9 Restrictions (Enabling Declaration establishing a plan for condominium
10 ownership of Redrock Park Subdivision) recorded November 21, 1985 in
11 Book 2220 of Official Records, Clark County, Nevada, as Document No.
12 2179985.

13 Parcel II:

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

22 Parcel III:

23 A non-exclusive easement for ingress and egress, public utilities and
24 private streets shown over Lot A (The Recreation Area) and common areas
25 Phase One (1) and Two (2) of the condominium project, as shown upon the
26 Plat of Redrock Park Subdivision filed pursuant to the provisions of N.R.S.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

117.020 recorded in Book 33 of Plats, Page 19, in the Official Records of the County Recorder, Clark County, Nevada and as defined in that certain Declaration of Restrictions (Enabling Declaration establishing a plan for condominium ownership of Redrock Park Subdivision) recorded November 21, 1985 in Book 2220 of Official Records, Clark County, Nevada, as Document No. 2179985.

Parcel IV:

An exclusive easement to use that portion of the Common Area designated as Parking Space No. 6-A, as shown upon the Plat of Redrock Park Subdivision filed pursuant to the provisions of N.R.S. 117.020 recorded in Book 33 of Plats, Page 19, in the Official Records of the County Recorder, Clark County, Nevada and as defined in that certain Declaration of Restrictions (Enabling Declaration establishing a plan for condominium ownership of Redrock Park Subdivision) recorded November 21, 1985 in Book 2220 of Official Records, Clark County, Nevada, as Document No. 2179985.

Parcel ID: 163-12-110-021.

3. If any property being subject to forfeiture pursuant to Title 31, United States Code, Section 5317(c)(1), as a result of any act or omission of the defendant –
- a. cannot be located upon the exercise of due diligence;
 - b. has been transferred or sold to, or deposited with, a third party;
 - c. has been placed beyond the jurisdiction of the court;
 - d. has been substantially diminished in value; or
 - e. has been commingled with other property that cannot be divided without difficulty;

