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August 12, 2015

BY FEDERAL EXPRESS

Hon. Ronald A. Guzman
United States District Judge
Northern District of Illinois
219 South Dearborn Street
Chicago, IL 60604

Re: United States v. Mastro, 12 CR 567

Dear Judge Guzman:

I am writing in advance of William Mastro's August 20, 2015 sentencing to provide the Court a fuller view of the defendant which was not contained in his attorneys' August 6, 2015 sentencing submission. A 1990 graduate of Duke Law School, I am a criminal defense attorney in good standing based in New York, practice primarily in the federal courts throughout the country and have appeared *pro hac vice* in numerous cases in the Northern District of Illinois since my admission to the New York bar in 1991. I've received the highest rating (AV) from the Martindale-Hubbell Legal Directory and am recognized in the Bar Register of Preeminent Lawyers. I have also been selected as a New York City *Super Lawyer* for being a leader in the field of criminal defense.

To begin, I write with some hesitancy because as a defense attorney I am not in the business of putting defendants in a bad light before any Court. In addition, I also represented a handful of witnesses who either testified in the grand jury against the Mastro defendants or who otherwise were debriefed by the government about the Mastro defendants' fraud. Nothing in this letter will touch on anything regarding these representations as I am writing strictly as a presumed victim of Mr. Mastro. This letter will instead deal with two issues: the full impact of Mr. Mastro's fraud, and second, the utter and complete lack of remorse Mr. Mastro has for his nearly decade-long fraud which affected hundreds if not thousands of bidders in his auctions – including people he calls his friends today.

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Background

My involvement in the baseball card hobby goes back to my childhood; however, I began bidding in Mastro Auctions on valuable vintage baseball cards approximately 10 years ago. At that time I was and am still presently a member of a popular vintage baseball card online forum called "Net 54" (<http://www.net54baseball.com/>), which counts thousands of experienced vintage card collectors as members. Net 54 is the most influential forum in the hobby as it is the only forum which provides the opportunity for vintage baseball card collectors from all over the world to "meet" on a daily basis and discuss, trade, buy and sell rare vintage baseball cards. Included in the daily discussions are issues affecting the hobby. Needless to say, there are literally thousands of members of Net 54 who have bid in Bill Mastro's auctions.

By April of 2005 there had already been discussions on Net 54 about suspected shill bidding in Mastro Auctions.¹ Numerous Net 54 members came to Mastro's defense (including at least one member who later testified against Mastro and Doug Allen as a witness in the grand jury which brought the present indictment) and, eventually, the original accuser retracted his comments by noting that "Doug Allen has graciously and promptly responded to my concerns He was very polite and understanding, and not accusatory or defensive at all. Very professional." Id. So began years of Mastro and his co-conspirators vehemently denying their commission of fraud to their victims – so that their fraud could continue hidden and unabated.

In June of 2006, the rumors of Mastro's fraud hit the news in an article contained in my local newspaper, the New York Daily News, which alleged that an FBI investigation into shill bidding by Mastro Auctions had been initiated.² When I first mentioned on Net 54 the article about the federal criminal investigation into shill bidding at Mastro – and the follow up in the NY Daily News on the investigation a year later³ – I fully expected a frenzy of concern. After all, Mastro Auctions, with yearly auction sales in the tens of millions of dollars, was the biggest auction house in our hobby – and as such Bill Mastro was arguably the most important person in

¹ Mastro Wins???, April 14, 2005, available at: <http://www.net54baseball.com/showthread.php?t=76820> (last viewed August 11, 2015).

² Michael O'Keeffe, It's a Flip of 'Coin' Probe. Investigators Have Eye on Sports Auction Giant in Ohio Collector Scandal, New York Daily News, June 18, 2006, available at <http://www.nydailynews.com/archives/sports/flip-coin-probe-investigators-eye-sports-auction-giant-ohio-collector-scandal-article-1.654825> (last visited July 27, 2015).

³ Michael O'Keeffe, FBI Probes Hobby Biz Honchos, New York Daily News, July 8, 2007, available at www.nydailynews.com/sports/more-sports/fbi-probes-hobby-biz-honchos-article-1.267017 (last visited July 27, 2015))

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our hobby. The idea that hundreds or thousands of bidders could have been defrauded by Mastro Auctions was shocking. However, nothing could have prepared me for the responses from the Net 54 community: the majority of the board members denied that Mastro could have been involved in any fraud (without having seen any of the auction bidding records), some claimed that the allegations were fabricated by the New York Daily News journalist who apparently “hated” the hobby, others argued that shill bidding was not fraud as long as the winning bidder paid at auction what he felt the card was worth, and lastly, one Net 54 member who repeatedly belittled my mention of the 2007 article by claiming that the article didn’t even exist – that the article I was paraphrasing was a figment of my imagination.⁴

What became very obvious to me at that point was not that card collectors were less intelligent than most but that in fact many collectors in the hobby were twisting themselves into pretzels to protect Mastro Auctions – for reasons. It appeared that such supporters were refusing to acknowledge even the news of the criminal investigation into Mastro Auctions because they had much to lose if Mastro Auctions was put out of business either due to the supernaturally high prices Mastro was getting for the supporters’ consignments due to shill bidding or because many of the supporters/consigners themselves conspired with the Mastro defendants in the shill bidding of their own lots. This theory was of course later proven as revealed in the Mastro plea agreement (pp. 7-8) which noted that Mastro permitted hundreds of shill bids by consigners on their own lots in order to artificially drive up the prices. Thus, any public bad news about Mastro Auctions was shouted down due to the financial considerations of those doing the shouting.

As a collector I have always been a buyer and not a consigner or seller of any cards; as solely a victim of Mastro and his co-conspirators (I’ve spent tens of thousands of dollars in their auctions), I had no financial interest in Mastro Auctions’ continued existence. Not surprisingly, once the evidence came to light about the Mastro defendants’ fraud I was one of the few unwilling to publicly make excuses for or cover up their criminal behavior.

As a victim of the Mastro defendants I obviously have a right to be angry, especially considering that the government has recommended to the Court that none of the Mastro defendants should be required to pay a single dollar of restitution back to their victims, which is even more egregious considering that the Mastro defendants literally stole from so many of their friends in the hobby with their fraud. I have certainly been outspoken about Bill Mastro’s fraud and have even publicly, via the Net 54 website, updated Mastro’s victims when he pleaded guilty and when sentencing was scheduled. I have also alerted Mastro’s victims that they have the right to submit letters to the Court about their experiences with Mastro in order to provide a more accurate depiction of the man who, as popularly known in the hobby, has a reputation of being a

⁴ Mastro Auctions Being Investigated by the FBI, July 9, 2007, available at: <http://www.net54baseball.com/showthread.php?t=86129> (last viewed August 11, 2015).

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dishonest bully.

Nevertheless, Mastro's defense counsel claims instead in its submission that any victim letters to the Court from Net 54 members who wrote at my urging should be looked at with a jaundiced eye. According to Mastro, I have "an apparent stake in this case" because a) I have represented a litigant who was sued by Mastro Auctions and Bill Mastro and b) because I have publicly criticized Mastro's plea agreement for failing to "provid[e] any monetary restitution to Bill's victims, some of whom the attorney represents." Mastro Sentencing Memorandum at p. 51, fn. 20. Of course, my criticism of the Mastro plea agreement is similar to some of the Court's own concerns after twice rejecting the plea agreement: What did the government actually get out of this deal? How have Mastro's victims been accounted for and compensated by the defendants for their fraud? No restitution and a plea deal which allows for a probationary sentence for the biggest fraudster in the history of sports memorabilia auction fraud hardly strikes fear into the hearts of future criminals in this industry. Regardless, how are Bill Mastro's victims any less of a victim if they write at my urging?

I am also unsure what "stake" I have in this case other than as a victim. I have never initiated any litigation against Mastro and, prior to meeting with the government with witnesses of Mastro's fraud, I agreed never to seek any restitution from the Mastro defendants. In addition, I have no financial stake in any of my clients' possible restitution in this case. Simply put, I am an unhappy victim of Bill Mastro and his co-conspirators and am unwilling to keep quiet about their fraud.

Mastro's Lack of Remorse for His Crimes

Mastro's attorneys skillfully lay out a theme to the Court in their submission: Bill Mastro is deeply remorseful for his criminal actions, has accepted responsibility for his crimes, and has apologized to his victims for his actions. Unfortunately, this is not true – and a non-custodial sentence for the ringleader of the largest historical sportscard and memorabilia auction house fraud will surely send the message to the many other bad actors in this field: you can steal without any moral compunction at all and in the end you won't spend a day in prison or pay a dollar in restitution back to your victims.

Despite Mastro's claims of apologies and remorse, not a single member of Net 54 has reported ever receiving an apology from Mastro. Not one of the thousands of members of the site, of which Mastro-related news is constantly discussed and viewed hundreds of thousands of times, has ever claimed to have received such an apology. As will be shown, Mastro instead heaps opprobrium on his victims who dare to speak up.

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And while Mastro's attorneys present him as man literally sick with remorse, there was a time when he actually spoke from the heart, at a time when he didn't think any federal judge would be listening: on the very day of his guilty plea, October 10, 2013. I alert the Court to Mastro's response to an article on the "Cardboard Connection" baseball card hobby website about two victim impact letters which had been submitted to the Court about him. Law of Cards: Letters to Judge Released in Bill Mastro Fraud Case, available at: <http://www.cardboardconnection.com/news/law-of-cards-letters-to-judge-released-in-bill-mastro-fraud-case> (last viewed July 27, 2015).

In the comments section of the article, Mastro bitterly complained about the letter writers, noting that one of the "victims" had actually years later sold the item he had purchased in a Mastro auction for more than he paid for it (as if that somehow negates the fraud); as for the second letter writer who claimed he believed he was defrauded by Mastro, Mastro charged that "[i]f he was so abused by us why keep doing business with us[?]" Id.

Mastro continued blaming his victims (including me) with this incredible statement:

Several months ago a collector and lawyer, Jeffrey Lichtman, who considers himself some sort of watch dog for the hobby, decided to publish my judges [sic] name and address on a popular website and encouraged collectors who thought they were ripped of to write directly to my judge. I have never met or talked with Lichtman in my whole life. I have no idea where such resentment comes from but to date my judge has received 2 letters....2! I had over 30,000 people on our mailing list and 2 people wrote letters. This is the first time I have responded to anything regarding my case with the government. It has been the most horrible ordeal me or my family have ever had to deal with and I wish people would please think hard before they try and interject their conjectures into such a sensitive matter.

Id.

Therefore, immediately following Mastro's guilty plea before the Court, he expressed no contrition for his crimes. Instead, he actually claimed he has "no idea where such resentment comes from" in my publicly speaking about Mastro defrauding myself and others. Mastro also claimed that his fraud was so minuscule – or perhaps nonexistent – as "proven" by the fact that at that time only two of his over 30,000 customers wrote victim impact letters to the Court, arguing, apparently, that this confirmed that only two Mastro customers were even arguably defrauded (and even those two he claimed were not victims as noted above). Mastro's lawyers also similarly lampoon his victims' claims at pages 51-53 of their sentencing memorandum,

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suggesting that “allegations simply do not suggest, let alone prove, shill bidding.”

Of course, this ridiculous argument ignores the fact that a) the bidding records which revealed Mastro’s shill bidding were never released to the public, thereby making it impossible for any bidder to know for certain if he had been defrauded; and b) Mastro destroyed years (2002-2007) of bidding records/evidence of his fraud solely so that his criminal activity could remain hidden. Yet now Mastro wants to blame his victims for not having the proof of his crimes which he destroyed solely to obstruct justice? Only a defendant as brazen as Mastro could claim that his fraud was “statistically infrequent ... [and] did not characterize his business practice” when in fact every significant employee knew about the open practice of shill bidding conducted during every auction for years at Mastro. Mastro Sentencing Memorandum at p. 3. And if Mastro’s fraud was so “statistically infrequent” why did he feel the need to destroy the evidence of his fraud?

It should also not be lost on the Court that Mastro’s public bashing of his victims on a baseball card website may have very possibly discouraged other victims who might have otherwise written to the court in order to be spared Mastro’s public venom. Indeed, numerous Mastro victims have asked me if it was possible to have letters to the Court sealed so as not to raise the ire of Mastro, a man still considered a powerful person in the hobby.

Finally, Mastro’s candid comments on the day of his guilty plea reveal the only people he believes are the true victims in this case: Bill Mastro and his family. Nowhere in his screed is any contrition for his crimes. Considering the incredibly favorable plea agreement that he worked out with the government – a recommendation of 20 months in prison and a promise not to ask for a single dollar in restitution, meaning Mastro would retain the fruits from his crimes, his self-pity is absolutely stunning. That his bitterness against his victims and lack of remorse was stated *on the very day he finally publicly accepted responsibility for his actions* makes it even more incredible. I will say this: in 25 years of practice as a criminal defense attorney in New York City, who has represented mafia bosses, Ponzi schemers and Colombian drug kingpins, I have never known any defendant to act as brazenly and unrepentant and unabashedly remorseless as Bill Mastro.⁵

⁵ To wit: Mastro a) repeatedly lays out his strong religious faith in his memorandum – conveniently ignoring the fact that one of his shill bidding accounts was in the name of his priest (Indictment at p. 10); and b) notes that he “accepted a fine that is more than double the highest end of the Sentencing Guidelines range ... and he paid it even before sentencing” (Sentencing Memorandum at p. 4) – without acknowledging that he strenuously negotiated a plea deal which does not require a single penny paid back in restitution; thus, the \$250,000 fine was paid by Mastro with the proceeds of a fraction of his fraud, the remainder of which he will keep.

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Mastro Stole From His Friends

As the head of the largest sportscard and memorabilia auction house at the time of his indictment, it cannot be overstated how significant and wide-ranging Mastro's fraud was: with multiple auctions per year over a period of years, it is logical to conclude that nearly all if not all of the thousands of regular bidders in Mastro auctions at one point bid on an auction lot which contained shill bidding – and the only reason this cannot be proven with certainty is due to Mastro's destruction of bidding records. He altered and lied about altering the most iconic baseball card in the hobby for his own gain. He sold fake memorabilia for his own gain. He also destroyed the confidence of sportscard and memorabilia collectors who bid in auctions by causing them to now believe that the system is rigged against them. Considering that a great percentage of sports collectibles are purchased through auction houses, this is no small harm. Therefore, it should not come as a surprise that Mastro has had some difficulty soliciting positive character letters from people in the hobby for his sentencing because many people who he apparently believes are his friends are also his victims. Thus, when Mr. Mastro or his lawyers contacted hobbyists for potential character letters, a large sense of shock swept through the hobby with the common response of "How could he do this?"

One example is found in the February 13, 2013 letter to the Court of Stephen J. Cummings, Ph.D., who wrote that after receiving "an email, followed by a phone call from [Mastro's] attorney asking me to write a character reference to the court" he realized that he himself had actually been "exploited" by Mastro due to his "naivete." February 13, 2013 Letter of Stephen J. Cummings, Ph.D. at p. 1. Describing Mastro as "a very aggressive, somewhat crude individual," Mr. Cummings instead told the truth about Mr. Mastro as someone who "thrives on taking advantage of others." Id. at pp. 1-2. "So, this is the "character letter" that I have chosen to write the court, quite different from the version his attorneys had suggested." Id. at p. 2.

Presumably, there must be a very good reason why any of Mr. Mastro's victims in the baseball card/memorabilia hobby would write a *positive* character letter to the Court on his behalf. One illustrative example is in the form of Leon Luckey, the owner of the Net 54 vintage baseball card forum mentioned throughout my letter. Luckey, a fervent supporter of Mr. Mastro and his co-conspirators during the investigation phase of this case, the indictment and conviction, finally had had enough and excoriated Mastro after he publicly blamed his victims on the day of his guilty plea in October 2013:

Even though I have considered Bill a hobby friend, and understand I was shill bid, I didn't have the amount of disrespect towards him which I do now, until I read his statement. That statement accepts no responsibility of his misdeeds. He caused his own problems, no

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one else. He really needs to accept responsibility for his actions. I find his statement disgusting. There were 2 letters [written to the Court about Mastro's conduct]? I can guarantee there will be at least 3 by the end of the day today.

Bill Mastro Denies Widespread Fraud In His Auctions -- Yesterday, October 11, 2013, available at: <http://www.net54baseball.com/showthread.php?t=177079> (last viewed August 11, 2015). Mr. Luckey didn't write his letter that day; however, on June 30, 2015 we learned that Mr. Luckey had been contacted by Mastro and his lawyers to instead write a *positive* character letter on his behalf to the Court:

I told Mastro's lawyer I expected restitution and an apology and I would think about a letter. *Nothing has changed (except a small gift in the mail which was appreciated)*. ... I WAS going to write a letter at one time but changed my mind⁶

After numerous Net 54 members expressed their open shock that Luckey would accept what appeared to be a bribe to write a positive character letter from a man who defrauded so many people in the hobby, Luckey noted that he would be returning the "gift" to Mastro. Id.

Mastro's Fraud Has Increased the Cost of Card Prices Going Forward

Mastro's claim that the loss from his fraud is between \$30,000 and \$70,000 dollars is painfully laughable. Hundreds to thousands of auction items over the years contained shill bids by Mastro and his many co-conspirators, yet today he claims in part that "potential bidders knew or should have known that shill bidding was present" in his auctions and thus no fraud existed. Government's Memorandum in Support of The Proposed Plea Agreement at p. 12. While Mastro had the reputation as the most "despicable" person in the hobby (October 18, 2013 Letter of Lew Lipset at p. 2), I can assure you that most of the tens of thousands of people who bid in his auctions still had no idea that Mastro was committing fraud. Regardless, even if some people knew he was committing fraud in the auctions many had no knowledge exactly which lots were being shilled – other than the consigners who had conspired with him to shill their own lots. And from these years of Mastro's fraud, falsely inflated prices for hundreds of cards and collectibles emerged. The impact of this fraud is immeasurable and will haunt the hobby for years.

⁶ Bill Mastro's Upcoming Sentencing, June 29, 2015, available at: <http://www.net54baseball.com/showthread.php?t=208076> (last viewed August 11, 2015)(italics added).

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The way collectors determine a card's value is by checking the recent prices of the same card in the same condition. Cards are graded by third party grading companies on a sliding numeric scale; the two leading grading companies (Professional Sports Authenticator ("PSA") and Sportscard Guaranty ("SGC")) grade cards, respectively, on 1-10 and 10-100 scales with the higher numbers on each scale representing the card in the better condition. Thus, apples to apples are compared when determining what a card is worth: for example, when a card such as a 1955 Topps Mickey Mantle card graded PSA 7 is at auction, bidders will enter online databases of public sales of all cards which are available to all collectors (such as VintageCardPrices.com) and seek out all recent prices realized on other 1955 Topps Mickey Mantle PSA 7 graded cards.

Card values are usually fueled by momentum in the marketplace: some cards are viewed as "hot" by collectors due to the quick increase in value as borne out by sales in the open market. Once a card breaks through a previously alltime high price at an auction collectors deem that price as the new market value of the card. This is simple economic principles in play, of course – except when someone fraudulently raises the sales price of that card. Bidders who participate in the auction of that shilled card may watch as the price increases in value above previously alltime high prices and incorrectly presume that there must be a significantly increased market interest in the card, i.e. that there must be numerous collectors willing to pay such a high price for such a card. Of course, the other "collectors" often were Bill Mastro or his co-conspirators – and a false sense of competition and interest is thus perceived for the shilled card.⁷

This phenomenon occurred hundreds if not thousands of times due to Mr. Mastro's fraud. Buyers paid more than what a card was actually worth due to the shill bidding, thinking that false price was what the card was actually worth. Except it wasn't. Sometimes the next time that card in that grade came up in an auction the proverbial bottom would drop out and the person who had bought the card at that grade in the Mastro auction immediately lost a lot of money. Other times, collectors seized on that false value increase and continued to pay fraudulently inflated prices for the card. This is the legacy of Bill Mastro: not only did he steal from his so-called friends with his crooked auctions, but his fraud continues to affect collectors today who are paying too much for cards, the values of which were fraudulently increased in his auctions.

Finally, Mastro speciously argues that his victims "paid what they were willing to pay for these discretionary purchases – indeed, 'might have spent the same amount of money absent the fraud,' according to the Senior Probation Officer and 'unlike in most fraud schemes, [] the victims actually gained something of value.'" Mastro Sentencing Memorandum at pp. 2-3. I

⁷ In Mastro's plea agreement at p. 4, he acknowledges that he "believed that the more bidders that bid on a given item, the higher the price that item would realize." He also "believed that active bidding on an item attracted more bidders to place bids on a particular item, because bidders were interested in purchasing items that were sought after by others."

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suppose the same argument could be made on behalf of stock fraudsters who inject false information about a company into the public domain in order to raise the interest and thus the stock price for unsuspecting investors to buy. After all, the stock purchaser paid what he wanted to pay for the stock and he ended up with something of value – shares in a legitimate stock via a “discretionary purchase.” This sort of rationalization of the fraud committed by Mastro and his co-conspirators boggles the mind.

As a criminal defense attorney who practices primarily in the federal system I am aware of the difficulty of calculating a loss figure in this case, although part of the blame should go to Mr. Mastro for purposely destroying bidding records. That being said, the idea that the financial losses caused by Mr. Mastro is limited to \$70,000 – or even \$1 million – is preposterous.⁸ What about the auction lots in which the underbidder was Mastro or his co-conspirators? Couldn't that loss amount be easily determined? Yet despite his purportedly massive remorse and acceptance of responsibility for his fraud, Mastro instead fought to deny his victims even a single dollar of restitution.

Conclusion

In many ways, Bill Mastro is a mini-Bernie Madoff. Like Madoff, Mastro quarterbacked the biggest fraud ever in his profession. Like Madoff, Mastro's persona was one of bullying arrogance and greed, who casually stole from his friends for years. Once caught, both blamed their victims for making the error of trusting them. Of course, Mastro is no Madoff in the size of the fraud or the sometimes deadly impact on the lives of his victims. But Madoff received a 150 year sentence and was forced to give up his ill-gotten gains to his victims; Bill Mastro is seeking a probationary sentence and received a recommendation from the government which will permit him to keep all the money he stole. Not only is this unfair, but such a sentence does not “reflect the seriousness of the offense, ... provide just punishment for the offense ... or afford adequate deterrence to criminal conduct” 18 U.S.C. §§ 3553(a)(2)(A), (B). Should Mastro not receive a significant prison sentence no deterrence will be established to prevent the next Bill Mastro from committing fraud.

⁸ Again, the \$1 million loss cap was estimated by the government without the benefit of years of bidding records destroyed by Mastro – yet now Mastro wants the benefit of his obstructive behavior.

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At bottom, I would implore the Court to review Bill Mastro's honest, heartfelt words on the very day he should have been accepting responsibility for his crimes, the day of his guilty plea. Instead, he revealed that he was concerned solely with himself, unable to even acknowledge the scope of his criminal conduct or to feel any concern for his victims. He expressed no understanding of why his victims might "resent" him – his victims instead are mere bothersome gnats to be swatted away. By submitting this letter, I simply wished the Court to see a fuller picture of the person who will appear before you for sentencing and that Mr. Mastro finally be forced to face the consequences of his actions. Thank you for the opportunity.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'J. Lichtman', with a long horizontal stroke extending to the right.

Jeffrey Lichtman

cc: Michael D. Monico, Esq. (by Federal Express)

Steven J. Dollear, Esq. (by Federal Express)
Assistant United States Attorney