



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 25, 2015

BY ECF AND HAND DELIVERY

The Honorable Thomas P. Griesa
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Prevezon Holdings, Ltd., et al.*, 13 Civ. 6326 (TPG)

Dear Judge Griesa,

The Government has received the defendants' request for reimbursement for their deposition expenses, and has released the requested amount of \$50,365.72, pursuant to the Court's October 19, 2015 Order. *See* Dkt. No. 374. The Government now respectfully requests a Court order (i) finding that this is a reasonable reimbursement for expenses related to three individuals travelling from Russia to New York to attend four days of depositions, and (ii) barring any further requests for reimbursement for this trip.

As background, the Government noticed three party witnesses for depositions in New York City from October 13-16, 2015: Denis Katsyv, Alexander Litvak, and Timofey Krit. The Court ordered the Government to release funds to cover the costs incurred by these witnesses to attend the depositions in New York. *See* Dkt. No. 374. The defendants have submitted \$50,365.72 of receipts for airfare, hotels, meals, and interpreter services, and the Government has released these funds. However, the defendants claim that this amount represents only a portion of the expenses for three witnesses to travel to New York City from Russia for four days of depositions, and that they intend to submit a further request for additional reimbursement.

The Government asks the Court to find that the \$50,365.72 released is amply sufficient to cover the cost of three witnesses attending four days of depositions. The expenses that the defendants have already claimed, and that the Government has reimbursed pursuant to the Court's order, include a two nights' stay at the Plaza Hotel in a \$995/night room for Natalia Veselnitskaya, who was not deposed and did not even attend the

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depositions in person, for the weekend after the depositions had concluded. Ms. Veselnitskaya appears to have stayed at a less expensive hotel during the depositions, but moved to the Plaza after the depositions concluded, and only after the Court orally stated that the Government would be responsible for reimbursing Defendants' expenses. These claimed expenses also include multiple expensive meals, such as a \$793.29 dinner for five individuals (although, again, only three witnesses were deposed), which included eighteen dishes, eight grappas, and two expensive bottles of wine.

Defendants claim that they "are collecting additional invoices and will submit a further request for reimbursement as soon as possible." The Government asks the Court to find that any reasonable expenses related to three individuals travelling to New York for three days of depositions have certainly been met by the payment of over \$50,000, and to hold that the Government is not required to release any further funds out of the properly-seized assets.

Respectfully submitted,

PREET BHARARA
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cc: Counsel of Record (via ECF)