

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

- against -

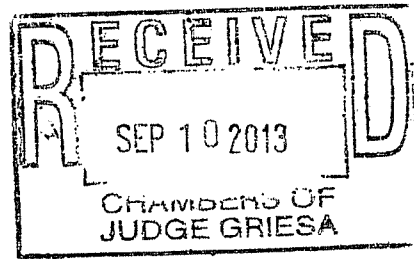
PREVEZON HOLDINGS LTD.,
PREVEZON ALEXANDER, LLC,
PREVEZON SOHO USA, LLC,
PREVEZON SEVEN USA, LLC,
PREVEZON PINE USA, LLC,
PREVEZON 1711 USA, LLC,
PREVEZON 1810, LLC,
PREVEZON 2009 USA, LLC,
PREVEZON 2011 USA, LLC,
FERENCOI INVESTMENTS, LTD.,
KOLEVINS, LTD.,

Defendants,

ANY AND ALL ASSETS OF PREVEZON
HOLDINGS, LTD.,

ANY AND ALL ASSETS OF PREVEZON
ALEXANDER, LLC, INCLUDING BUT
NOT LIMITED TO 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 ("250
EAST 49th STREET, UNIT COMM3")
AND ANY AND ALL FUNDS ON DEPOSIT
IN BANK OF AMERICA ACCOUNT
NUMBER 4830 4456 8293 HELD IN
THE NAME OF PREVEZON ALEXANDER
LLC (THE "PREVEZON ALEXANDER
ACCOUNT"),

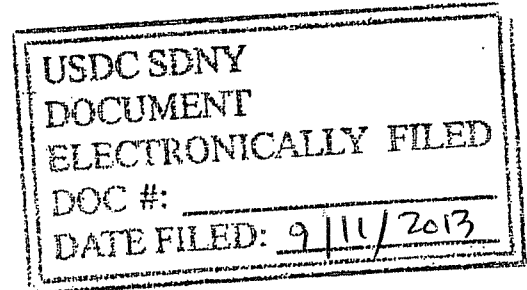
ANY AND ALL ASSETS OF PREVEZON
SOHO USA, LLC, INCLUDING BUT
NOT LIMITED TO ANY AND ALL



POST-COMPLAINT PROTECTIVE
ORDER PURSUANT TO
18 U.S.C. § 983(j)(1)

No. 13 Civ. 6326 (TPG)

ECF Case



FUNDS ON DEPOSIT IN BANK OF :
AMERICA ACCOUNT NUMBER 4830 :
1615 8084 HELD IN THE NAME OF :
PREVEZON SOHO USA LLC (THE :
"PREVEZON SOHO ACCOUNT"), :
:

ANY AND ALL ASSETS OF PREVEZON :
SEVEN USA, LLC, INCLUDING BUT :
NOT LIMITED TO ALL RIGHT, TITLE :
AND INTEREST IN THE REAL :
PROPERTY AND APPURTENANCES KNOWN :
AS 127 SEVENTH AVENUE A/K/A 166 :
WEST 18th STREET, RETAIL UNIT #2, :
NEW YORK, NEW YORK ("127 SEVENTH :
AVENUE, RETAIL UNIT 2") AND ANY :
AND ALL FUNDS ON DEPOSIT IN BANK :
OF AMERICA ACCOUNT NUMBER 4830 :
4174 6021 HELD IN THE NAME OF :
PREVEZON SEVEN USA LLC (the :
"PREVEZON SEVEN ACCOUNT"), :
:

ANY AND ALL ASSETS OF PREVEZON :
PINE USA, LLC, INCLUDING BUT NOT :
LIMITED TO 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 ("20 PINE :
STREET, UNIT 2308"), :
:

ANY AND ALL ASSETS OF PREVEZON :
1711 USA, LLC, INCLUDING BUT NOT :
LIMITED TO 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 ("20 PINE :
STREET, UNIT 1711"), :
:

ANY AND ALL ASSETS OF PREVEZON :
1810, LLC, :
:

ANY AND ALL ASSETS OF PREVEZON :
2009 USA, LLC, INCLUDING BUT NOT :
LIMITED TO 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 ("20 PINE :
 STREET, UNIT 2009"), :
 :
 ANY AND ALL ASSETS OF PREVEZON :
 2011 USA, LLC, INCLUDING BUT NOT :
 LIMITED TO 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"), :
 :
 ANY AND ALL ASSETS OF FERENCOI :
 INVESTMENTS, LTD., :
 :
 ANY AND ALL ASSETS OF KOLEVINS, :
 LTD., :
 :
 :
 and all property traceable :
 thereto, :
 :
 Defendants in Rem. :
 :

WHEREAS, on September 10, 2013, the United States commenced
 this action, upon the filing of a verified complaint (the
 "Complaint"), seeking forfeiture of the above-captioned
 defendants in rem (the "Defendants in Rem");

WHEREAS, the Complaint alleges, in part, that PREVEZON
 HOLDINGS, LTD. ("Prevezon Holdings"); Prevezon Alexander, LLC
 ("Prevezon Alexander"), Prevezon Soho USA, LLC ("Prevezon
 Soho"), Prevezon Seven USA, LLC ("Prevezon Seven"), Prevezon
 Pine USA, LLC ("Prevezon Pine"), Prevezon 1711 USA, LLC

("Prevezon 1711"), Prevezon 1810, LLC ("Prevezon 1810"), Prevezon 2009 USA, LLC ("Prevezon 2009"), and Prevezon 2011 USA, LLC ("Prevezon 2011") (collectively the "Prevezon Entities") are related corporate entities responsible for managing real property in the Southern District of New York;

WHEREAS, the Complaint further alleges, in part, that in 2007, a Russian criminal organization (the "Organization") engaged in an elaborate tax refund fraud scheme that defrauded Russian taxpayers out of approximately U.S. \$230 million; that the fraud proceeds were laundered through a series of shell companies in Russia and in other countries; and that some of these fraud proceeds were transferred from shell companies in the Republic of Moldova to PREVEZON HOLDINGS, which then used those funds, commingled with other funds from FERENCOI INVESTMENTS, LTD. and KOLEVINS, LTD. (together with the Prevezon Entities, the "Defendants in Personam") and other sources, to purchase multiple pieces of real estate in the Southern District of New York, which were held by the other Prevezon Entities;

WHEREAS, the Complaint alleges that the Defendants in Rem are forfeitable to the United States pursuant to 18 U.S.C. §§ 981(a)(1)(A), 985, as property involved in money laundering and attempted money laundering transactions, in violation of 18 U.S.C. §§ 1956 and 1957;

WHEREAS, the United States has applied for a protective

order to preserve the availability of the Defendants in Rem for civil forfeiture; and

WHEREAS, the United States submits that the entry of the requested protective order will vest this Court with sufficient actual and/or constructive control of the Defendants in Rem to establish this Court's in rem jurisdiction over the Defendants in Rem;

NOW, THEREFORE, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED, PURSUANT TO 18 U.S.C. § 983(j)(1)(A), THAT:

1. The following persons :

- a. PREVEZON HOLDINGS, LTD. ("PREVEZON HOLDINGS"); PREVEZON ALEXANDER, LLC ("PREVEZON ALEXANDER"), PREVEZON SOHO USA, LLC ("PREVEZON SOHO"), PREVEZON SEVEN USA, LLC ("PREVEZON SEVEN"), PREVEZON PINE USA, LLC ("PREVEZON PINE"), PREVEZON 1711 USA, LLC ("PREVEZON 1711"), PREVEZON 1810, LLC ("PREVEZON 1810"), PREVEZON 2009 USA, LLC ("PREVEZON 2009"), AND PREVEZON 2011 USA, LLC ("PREVEZON 2011") (collectively the "Prevezon Entities"); FERENCOI INVESTMENTS, LTD. ("FERENCOI"); and KOLEVINS, LTD. ("KOLEVINS") (FERENCOI, KOLEVINS and the Prevezon Entities collectively, the "Defendants in Personam"); and
- b. all attorneys and other persons and entities acting for or in concert with the above-named businesses and/or entities having actual knowledge of this Order;

(the "Restrained Persons") shall not take any action prohibited by this Order;

2. The Restrained Persons, their attorneys, agents, employees and anyone acting on their behalf, and all persons or entities acting in concert or participation with any of the above, all relevant financial institutions, and all persons and entities having actual knowledge of this Order, shall not, directly or indirectly, transfer, sell, assign, pledge, hypothecate, encumber, or dispose of in any manner; cause to be transferred, sold, assigned, pledged, hypothecated, encumbered, disposed of in any manner; or take, or cause to be taken, any action that would have the effect of depreciating, damaging, or in any way diminishing the value of property or other interests belonging to, or owed to, or controlled in whole or in part by the defendant, which property or other interests are subject to forfeiture. The property interests hereby restrained are the following:

- a. ANY AND ALL ASSETS OF PREVEZON HOLDINGS, LTD.,
- b. ANY AND ALL ASSETS OF PREVEZON ALEXANDER, LLC, INCLUDING BUT NOT LIMITED TO 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 ("250 EAST 49th STREET, UNIT COMM3") AND ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER 4830 4456 8293 HELD IN THE NAME OF PREVEZON ALEXANDER LLC (THE "PREVEZON ALEXANDER ACCOUNT"),
- c. ANY AND ALL ASSETS OF PREVEZON SOHO USA, LLC, INCLUDING BUT NOT LIMITED TO ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER 4830

1615 8084 HELD IN THE NAME OF PREVEZON SOHO USA LLC (THE "PREVEZON SOHO ACCOUNT"),

- d. ANY AND ALL ASSETS OF PREVEZON SEVEN USA, LLC, INCLUDING BUT NOT LIMITED TO ALL RIGHT, TITLE AND INTEREST IN THE REAL PROPERTY AND APPURTENANCES KNOWN AS 127 SEVENTH AVENUE A/K/A 166 WEST 18th STREET, RETAIL UNIT #2, NEW YORK, NEW YORK ("127 SEVENTH AVENUE, RETAIL UNIT 2") AND ANY AND ALL FUNDS ON DEPOSIT IN BANK OF AMERICA ACCOUNT NUMBER 4830 4174 6021 HELD IN THE NAME OF PREVEZON SEVEN USA LLC (the "PREVEZON SEVEN ACCOUNT"),
- e. ANY AND ALL ASSETS OF PREVEZON PINE USA, LLC, INCLUDING BUT NOT LIMITED TO 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 ("20 PINE STREET, UNIT 2308"),
- f. ANY AND ALL ASSETS OF PREVEZON 1711 USA, LLC, INCLUDING BUT NOT LIMITED TO 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 ("20 PINE STREET, UNIT 1711"),
- g. ANY AND ALL ASSETS OF PREVEZON 1810, LLC,
- h. ANY AND ALL ASSETS OF PREVEZON 2009 USA, LLC, INCLUDING BUT NOT LIMITED TO 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 ("20 PINE STREET, UNIT 2009"),
- i. ANY AND ALL ASSETS OF PREVEZON 2011 USA, LLC, INCLUDING BUT NOT LIMITED TO 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"),
- j. ANY AND ALL ASSETS OF FERENCOI INVESTMENTS, LTD.,
- k. ANY AND ALL ASSETS OF KOLEVINS, LTD.,

(collectively, the "Defendants in Rem"), which are alleged to constitute property involved in money laundering.

3. The United States Attorney's Office for the Southern District of New York, in its discretion, is authorized to direct the release of assets restrained herein.

4. The institutions listed in this Order where the defendant maintained assets may contact the following Assistant United States Attorneys to clarify the scope of the Order: Assistant United States Attorneys Paul M. Monteleoni, Telephone Number (212) 637-2219 and Christine I. Magdo, Telephone Number (212) 637-2297. Those institutions will not be deemed in violation of this Order for any transactions undertaken upon oral approval made by either of the aforementioned Assistant United States Attorneys.

5. Upon request by the Government, the above identified financial institution will identify the account name, account number and signatories for the restrained account and provide the Government with monthly statements of the restrained account and the balance in the account.

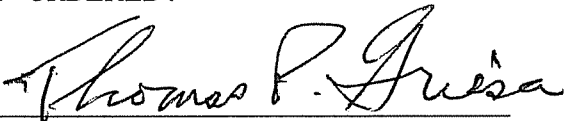
6. Any financial institution named herein shall accept service of this Order by email or facsimile transmission provided that an original hard copy is thereafter served by regular mail.

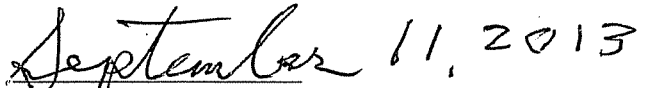
7. Service of a copy of this Order shall be made on the defendant's attorney by regular mail.

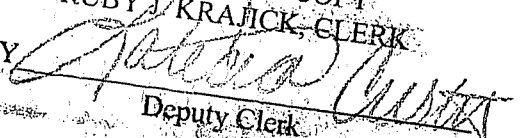
8. The Restrained Persons shall maintain all books and records in their possession, custody, and/or control, that relate in any manner or part to the Defendants in Rem and/or the allegations in the Complaint.

9. The Court hereby finds that the entry of this protective order vests the Court with *in rem* jurisdiction over the Defendants in Rem.

SO ORDERED:


HONORABLE THOMAS P. GRIESA
UNITED STATES DISTRICT JUDGE
SOUTHERN DISTRICT OF NEW YORK


DATE

A CERTIFIED COPY
RUBY KRAJICK, CLERK
BY 
Deputy Clerk