

STATE OF ILLINOIS)
)
COUNTY OF COOK) SS

AFFIDAVIT OF RON BRAVER

I, Ron H. Braver, being duly sworn state:

1. I was retained by Michael Segal to determine the amount of cash and property collected by the United States Government (“United States” or “Government”) from certain assets in connection with the forfeiture proceedings in *United States v. Michael Segal*, 02 CR 112-01.

2. From September 1985 through January 2007, I served as a Special Agent with the Internal Revenue Service’s (“IRS”) Criminal Investigation Division. From January 2007 until my retirement on September 30, 2010, I served as a Supervisory Special Agent with the IRS’s Criminal Investigation Division.

3. During my 25 years of federal law enforcement service, I investigated allegations of both tax and money laundering schemes. The various money laundering schemes required gathering and uncovering evidence related to various specified unlawful activities such as mail and wire fraud, bank and mortgage fraud, and bankruptcy fraud, among others. I have also investigated and assisted in the prosecution of allegations of obstruction of justice. The majority of my federal law enforcement experience involved investigations of “white collar” offenses. My training and experience included the ability to piece together, analyze and trace sophisticated financial transactions. Over the years, I have participated in or supervised hundreds of financial investigations.

4. As a federal agent, I received training at the Federal Law Enforcement Training Center in Glynco, Georgia. I also received additional training on the job.

5. From October 2010 through July 2012, I was a senior manager in the forensic

accounting, investigation and dispute services practice at Grant Thornton LLP, an international public accounting firm.

6. Since July 2012, I have been the managing member of Ron Braver & Associates, LLC, located at 125 S. Wacker Drive, Suite 1000, in Chicago, Illinois. The principal activity of my business is providing forensic accounting, investigation, and dispute services.

7. I earned a Bachelor of Science degree in Accounting in 1984 from Truman State University, formerly known as Northeast Missouri State University. In 1991, I earned a Master of Science degree in Taxation from DePaul University's Kellstadt Graduate School of Business.

8. I passed the Certified Public Accounting Exam in 1985. On March 2, 1991, I was licensed as a Certified Public Accountant ("CPA") by the Illinois Department of Financial and Professional Regulation, and I have maintained that license in an active status since 2010. I am also a Certified Fraud Examiner, a Certified Anti-Money Laundering Expert, and an Illinois licensed Private Detective.

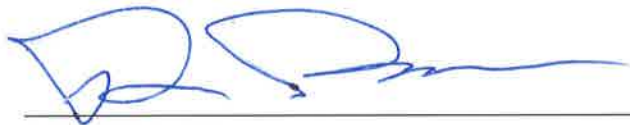
9. Appendix A to this Affidavit is a summary of the total cash the Government collected to date from the seizure of each of the assets I was asked to review. The total amount collected by the Government from the seizure of the assets I reviewed is at least \$32,246,063.91. Of that amount, \$23,633,428.25 represents cash distributions and sales proceeds generated by partnership assets. Another \$6,009,541.00 represents net proceeds from the sale of Michael Segal's personal residence in Highland Park, Illinois. Finally, a remaining sum of \$2,603,094.66 represents money kept in various financial accounts. Appendix A is a spreadsheet that itemizes these findings.

10. In order to compute the amounts referenced above, I relied on two main categories of documents. First, I relied upon accounting documents created by Thomas Moriarty. Mr. Moriarty is a special investigator employed by the United States Attorney for the Northern

District of Illinois. Mr. Moriarty was charged with itemizing the assets seized or restrained in connection with Mr. Segal's case as well as with monitoring distributions and sales proceeds the United States collected from those assets. Mr. Moriarty's accounting work is further described in his Affidavit of June 17, 2013, which I have also reviewed. Second, I relied on bank drafts, receipts from the United States Marshals Service, payment ledgers, and correspondence related to the various assets. The specific documents I relied upon during my review of each asset are described more specifically on Appendix B to this Affidavit.


11. Naturally, my current computation does not account for any future distributions or sales proceeds collected by the Government with respect to the assets itemized on Appendix A.

I declare under penalty of perjury that the foregoing is true and correct.



RON BRAVER

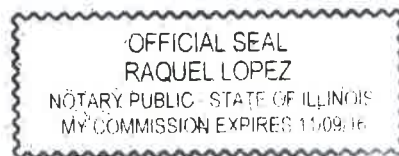
On this 25th day of May, 2016, before me, a Notary Public, personally appeared RON BRAVER, who acknowledged that the facts contained in the above Affidavit are true and correct according to his best information, knowledge and belief.



Notary Public

My Commission Expires:

11/9/2016



Appendix A

	Government's Asserted Value	DISTRIBUTIONS		Asset Sale Proceeds	Total Cash Payments to Government	
		On or Before February 4, 2013	After February 4, 2013			
Chicago Bulls Limited Partnership-BSV Limited Partnership United Center & Bulls Media LLC	\$ 2,087,500.00	\$ 3,446,842.00		\$ 2,087,500.00	\$ 5,534,342.00	Purchased after settlement
Chicago White Sox	\$ 2,200,000.00	\$ 297,556.00			\$ 297,556.00	Operating entity
Lincoln Place Associates	\$ 2,500,000.00	\$ 1,112,309.00	\$ 604,891.45	\$ 9,774,857.10	\$ 11,492,057.55	Sold after settlement
Sheridan House Associates	\$ 750,000.00	\$ 1,305,183.32	\$ 573,614.90		\$ 1,878,798.22	Operating entity
Peterson Plaza Associates	\$ 5,000.00	\$ 5,150.74	\$ 1,302.11	\$ 39,984.00	\$ 46,436.85	Sold after settlement
Peterson Plaza Developments	\$ 185,000.00	\$ 427,494.83	\$ 116,033.92	\$ 1,959,217.00	\$ 2,502,745.75	Sold after settlement
Chestnut Place Associates	\$ 225,000.00	\$ 48,040.24	\$ 12,203.74	\$ 749,407.00	\$ 809,650.98	Sold after settlement
Asbury Plaza Venture LLLP	\$ 25,000.00	\$ 19,791.15	\$ 87,083.34		\$ 106,874.49	Operating entity
Elm Street Plaza Venture LLLP	\$ 25,000.00	\$ 454.55	\$ 12,159.20		\$ 12,613.75	Operating entity
East Bank Club Venture	\$ 345,000.00	\$ 424,758.00		\$ 345,000.00	\$ 769,758.00	Purchased after settlement
1028 N. Rush St. Corp (Gibson's)	\$ 195,000.00	\$ 81,000.00			\$ 81,000.00	Segal received in settlement with no distributions
Joe's Stone Club of Chicago, LLC	\$ 34,000.00	\$ 101,594.66			\$ 101,594.66	Operating entity
Total cash received by government from seizure of Michael Segal partnership assets						\$ 23,633,428.25
405. Sheridan, Highland Park, Illinois						\$ 6,009,541.00
Merrill Lynch	5F5-37M31	#			\$ 681,595.58	
Merrill Lynch	5F5-37I61	#			\$ 280,534.43	
Merrill Lynch	637-03451	#			\$ 351,517.00	
Merrill Lynch	637-93450	#			\$ 555,465.65	
National Financial Services/ABN AMRO	TNE-002020 163732	#			\$ 218,793.00	
National Financial Services/ABN AMRO	TNE-31070.165794	#			\$ 26,311.00	
Lasalle Bank/Bank of America	530071100-8	#			\$ 28,036.00	
Lasalle Bank/Bank of America	530071101-6	#			\$ 18,853.00	
MidAmerican Bank FSB Mid Town Bank	200250818	#			\$ 104,153.00	
MidAmerican Bank FSB Mid Town Bank	200250814	#			\$ 174,996.00	
Oppenheimer	G381654990	#			\$ 50,782.00	
Oak Trust & Savings	1032003	#			\$ 108,731.00	
Northern Trust Bank	2022176	#			\$ 3,327.00	
Total cash received by government from seizure of financial accounts held for the benefit of Michael Segal						\$ 2,603,094.66
Total value received by government from the seizure of assets of Michael Segal						\$ 32,246,063.91

! Estimated value per government - actual
values may differ
Account valued at approximate time of
settlement per government schedule

Appendix B
(Documents Reviewed and Relied On By Asset)

Chicago Bulls Limited Partnership, BSV Limited Partnership United Center & Bulls Media LLC

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- March 7, 2016 Court Order (Docket 2011).

Chicago White Sox

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty.

Lincoln Place Associates

- Affidavit of Thomas Moriarty, Special Investigator.
- 2013 Summary Schedule prepared by Thomas Moriarty.
- Lincoln Place Apartments Bank Draft No. 25126; Date: 3/27/2013; Payee: United States Marshal's Seized Assets Deposit Fund; Amount: \$128,888.65;
- Magellan Property Management LLC Bank Draft No. 25926; Date: 2/19/2014; Payee: United States Marshal's Seized Assets Deposit Fund; Amount: \$9,774,857.10;
- 4/13/2016 Payee Ledger, Payee Name: United States Marshal's Seized.

Sheridan House Associates

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- Sheridan House Associates Bank Draft No. 1308; Date: 4/5/2013; Payee: U.S. Marshall [sic] Seized Asset Mgmt. Acct.; Amount: \$126,825.93;
- Sheridan House Associates Bank Draft No. 1310; Date: 4/5/2013; Payee: U.S. Marshall [sic] Seized Asset Mgmt. Acct.; Amount: \$126,825.93;
- U.S. Dept. of Justice Receipt (unnumbered/undated), showing payment of \$126,825.93 from "Joy" and \$126,825.93 from "Michael";
- Sheridan House Associates Bank Draft No. 1359; Date: 4/7/2014; Payee: U.S. Marshall [sic] Seized Asset Mgmt. Acct.; Amount: \$121,159.72; "Distribution for Michael Segal";
- Sheridan House Associates Bank Draft No. 1360; Date: 4/7/2014; Payee: U.S. Marshall [sic] Seized Asset Mgmt. Acct.; Amount: \$121,159.72; "Distribution for Joy Segal";
- U.S. Dept of Justice Receipt; Date: 5/8/2014; Number 05 FBI 003224; showing payment of \$121,159.72 from Sheridan House Associates – Joy Segal;
- U.S. Dept of Justice Receipt; Date: 5/8/2014; Number 05 FBI 002967; showing payment of \$121,159.72 from Sheridan House Associates – Michael Segal;
- Sheridan House Associates Bank Draft No. 1411; Date: 4/2/2015; Payee: U.S. Marshal Seized Asset Mgmt Acct; Amount: \$38,821.75;
- Sheridan House Associates Bank Draft No. 1415; Date: 4/2/2015; Payee: U.S. Marshal Seized Asset Mgmt Acct; Amount: \$38,821.75;
- U.S. Dept. of Justice Receipt; Date: 4/2/2015; Number 05 FBI 002195; showing payment of \$38,821.75 from Sheridan House Associates;

- U.S. Dept. of Justice Receipt; Date: 4/2/2015; Number 05 FBI 002196; showing payment of \$38,821.75 from Sheridan House Associates.

Peterson Plaza Associates

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- Peterson Plaza Associates Bank Draft No. 1366; Date: 4/1/2015; Payee: U.S. Marshal Seized Asset Mgmt Acct.; Amount: \$1,127.23; “Distribution for Michael Segal”;
- U.S. Dept of Justice Receipt; Date: 4/2/2015; Number 05 FBI 002968; showing payment of \$1,127.23;
- Peterson Plaza Associates Bank Draft No. 1048; Date: 10/16/2015; Payee: U.S. Marshall [sic] Seized Asset Mgmt Account.; Amount: \$174.88;
- U.S. Dept of Justice Receipt; Date: 12/17/2015; showing payment of \$174.88;
- Peterson Plaza Associates Bank Draft No. 353299; Date: 8/17/2015; Payee: United States Marshal Seized Asset Account; Amount: \$39,984;
- U.S. Dept of Justice Receipt; Date: 8/18/2015; Number 05 FBI 002968; showing payment of \$39,984.

Peterson Plaza Development

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- Peterson Plaza Development Co Bank Draft No. 1025; Date: 4/2/2015; Payee: U.S. Marshall [sic] Seized Asset Mgmt Account.; Amount: \$88,333.33;
- U.S. Dept of Justice Receipt; Date: 4/2/2015; Number 05 FBI 002966; showing payment of \$88,333.33;
- Peterson Plaza Development Company Bank Draft No. 1002; Date: 4/17/2015; Payee: U.S. Marshall [sic] Seized Asset Mgmt Account.; Amount: \$27,700.59;
- U.S. Dept of Justice Receipt; Date: 12/17/2015; showing payment of \$27,700.59;
- Peterson Plaza Dev Co Bank Draft No. 353298; Date: 8/17/2015; Payee: United States Marshal Seized Asset Account; Amount: \$1,959,217;
- U.S. Dept of Justice Receipt; Date: 8/18/2015; Number 05 FBI 002966; showing payment of \$1,959,217.

Chestnut Place Associates

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- “Chestnut Place Cash Disbursements 2000-2015” ledger of payments.

Asbury Plaza Venture LLLP

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- Email of Stephen Galler, Date: March 31, 2016.

Elm Street Plaza Venture LLLP

- Affidavit of Thomas Moriarty, Special Investigator;

- 2013 Summary Schedule prepared by Thomas Moriarty;
- Email of Stephen Galler, Date: March 31, 2016.

East Bank Club Venture

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty.

1028 N. Rush St Corp (Gibson's)

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty.

Joe's Stone Crab of Chicago, LLC

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty.

405 Sheridan, Highland Park, Illinois

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- October 31, 2006 Court Order (Docket 1153).

Individual Accounts (itemized on Appendix A).

- Affidavit of Thomas Moriarty, Special Investigator;
- 2013 Summary Schedule prepared by Thomas Moriarty;
- Consolidated Schedule of Assets January 2013.