



U.S. Department of Justice

United States Attorney
Northern District of Illinois

William R. Hogan, Jr.
Assistant United States Attorney

Dirksen Federal Building
219 S. Dearborn
Chicago, Illinois 60604

(312) 353-5300
(312) 886-4185
FAX: (312) 886-3502

December 12, 2012

Edward T. Joyce
Edward T. Joyce & Associates
135 S. LaSalle Street
Suite 2200
Chicago, Il. 60603

Re: Segal Forfeiture Hearing

Dear Mr. Joyce:

Regarding your letter of December 7, 2012 about whether the four IRA accounts are covered by ERISA, please be advised that we still have not reached a final determination about their status. Moreover, your stated understanding that Dennis Czurylo provided Mr. Moriarty with documentation supporting the fact that these are ERISA accounts and therefore not subject to forfeiture is incorrect. Mr. Czurylo had a brief telephone conversation with Mr. Moriarty about the accounts but did not provide any documentation or substantive information about them.

not correct

Last week I attempted to schedule a meeting to review the documents we intend to offer regarding the ownership of the assets at issue in the forfeiture hearing. Please confirm whether you and Ms. Doherty will be available to meet on the afternoon of December 19. As I advised Ms. Doherty, we will do our best to get you any additional documents before the meeting so that we have a common basis for discussion.

set up given access to boxes

Finally, you have stated numerous times over the years that you would furnish us documents that support your position that Mr. Segal personally owns or is entitled to the various assets at issue in the hearing. However, to date we have received nothing. Please provide whatever documents you plan to use before we meet. Please also advise us whether you intend to examine any of the boxes in the warehouse based on the indices I furnished last week.

*Not false
Hogan denied forfeiture
deft. Subpoena records*

Very truly yours,

GARY S. SHAPIRO
Acting United States Attorney

By: *s/ William R. Hogan, Jr*
WILLIAM R. HOGAN, JR.
Assistant United States Attorney
219 South Dearborn Street
Chicago, Illinois 60604
Phone: (312) 886-4185