

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 08-364 (RHK/AJB)

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) **BILL OF PARTICULARS FOR**
) **FORFEITURE OF PROPERTY**
 (1) THOMAS JOSEPH PETTERS,)
 (2) PETTERS COMPANY, INC.,)
 (3) PETTERS GROUP WORLDWIDE,)
 LLC,)
 Defendants.)

COMES NOW the United States Attorney's Office for the District of Minnesota, by and through Frank J. Magill, Jr., United States Attorney, and Joseph T. Dixon, Assistant United States Attorney, and hereby files the following Bill of Particulars.

The Indictment filed in this action seeks the forfeiture of property pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and 982(a)(1), and Title 28, United States Code, Section 2461(c), as a result of the offenses alleged in Counts 1 through 20 of the Indictment.

The United States hereby gives notice that if as a result of any act or omission of the defendants any forfeitable property:

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or

- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1), and by Title 28, United States Code, Section 2461(c), to seek the forfeiture of other property of said defendants, including the following property:

- a. the real property located at 320 Elk Circle, Dillon, Colorado 80435, together with its buildings, appurtenances, improvements, fixtures, attachments and easements; and
- b. the real property located at 15823 50th Avenue North, Plymouth, Minnesota 55446, together with its buildings, appurtenances, improvements, fixtures, attachments and easements.

Dated: December 22, 2008

Respectfully submitted,

FRANK J. MAGILL, JR.
United States Attorney

s/ Joseph Dixon
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