

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

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 v.) **SECOND**
) BILL OF PARTICULARS FOR
) FORFEITURE OF PROPERTY
(1) THOMAS JOSEPH PETERS,)
(2) PETERS COMPANY, INC.,)
(3) PETERS 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 Second 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.

As a result of the violations alleged in Counts 1 through 20 of the Indictment, the United States seeks forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1)(C), 982(a)(1), and Title 28, United States Code, Section 2461(c), of all Defendant Thomas Joseph Petters' right, title and interest in any property, real or personal, which constitutes or is derived from proceeds traceable to such violations, any property used or intended to be used in any manner or part to commit and to facilitate the

commission of said violations, or any property, real or personal involved in said violations, or any property traceable to such property including but not limited to the following:

- a. the real property and premises located at 655 Bushaway Road, Wayzata, Minnesota 55391, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, and/or proceeds traceable to the sale of said property;
- b. the real property and premises located at 320 Elk Circle, Dillon, Colorado 80435, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, and/or proceeds traceable to the sale of said property;
- c. the real property and premises located at 1840 South Ocean Boulevard, Lake Worth, Florida 33462, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, and/or proceeds traceable to the sale of said property;
- d. any and all funds held in JP Morgan Account No. A56676009 in the name of Thomas J. Petters;
- e. any and all funds held in JP Morgan Account No. A72735003 in the name of Thomas J. Petters;
- f. any and all funds held in JP Morgan Account No. A81794009 in the name of Thomas J. Petters;
- g. any and all funds held in JP Morgan Account No. Q17438005

in the name of Thomas J. Petters; and

- h. any and all funds held in JP Morgan Account No. A58860007
in the name of Thomas J. Petters.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in 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).

All in violation of Title 18, United States Code, Sections 2, 371, 981(a)(1)(C), 982(a)(1), 1341, 1343, 1956(a)(1)(B)(i), 1956(h) and 1957.

Date: March 19, 2009

Respectfully submitted,

FRANK J. MAGILL, JR.
United States Attorney

s/ Joseph T. Dixon, III

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